UNITED STATES ANIMAL HEALTH ASSOCIATION

2026 Resolution
130th Annual Meeting
October 15-21, 2026
Madison, WI

RESOLUTION NUMBER: 23 APPROVED

SOURCE: **COMMITTEE ON CATTLE AND BISON**

SUBJECT MATTER: **Revise the Federal Highly Pathogenic Avian Influenza in Livestock Testing Order to Remove the "30 cow" Provision and to Recognize On-Farm Bulk Tank Testing**

RESOLUTION:

The United States Animal Health Association urges the United States Department of Agriculture, Animal and Plant Health Inspection Service to revise the livestock movement guidance issued on January 21, 2026[1] to eliminate the requirement to individually test 30 cows and instead require exporting dairies in states with "Provisionally Unaffected" or "Affected" status under the National Milk Testing Strategy to obtain two negative polymerase chain reaction test results from bulk tank milk samples representative of the entire milking herd, collected a minimum of seven days apart within 14 days before shipment.

BACKGROUND INFORMATION:

On April 24, 2024, the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS) issued the *Federal Order Requiring Testing for and Reporting of Highly Pathogenic Avian Influenza (HPAI) in Livestock*, effective April 29, 2024. This order established premovement testing requirements for lactating dairy cattle at a time when little was known about the effects of H5N1 influenza on dairy herds or the national prevalence of the disease.

Subsequently, USDA-APHIS issued another order, the *Federal Order Requiring Additional Testing for and Reporting of Highly Pathogenic Avian Influenza (HPAI) in Livestock and Milk*, effective December 6, 2024. This order established the National Milk Testing Strategy (NMTS), providing a roadmap for achieving H5N1 influenza-free status in the nation's dairy herds.

As of October 2026, 41 states have achieved Stage 4 "Unaffected" status through state-level surveillance programs developed in collaboration with USDA-APHIS. Updated guidance[1] issued by USDA-APHIS on January 21, 2026 provides for the interstate movement of lactating dairy cattle without HPAI testing if they originate from a state with "Unaffected" status. Options for the movement of lactating dairy cattle from states with "Affected" or "Provisionally Unaffected" status include either (1) active status in the Dairy Herd Status Program or (2) testing milk samples from no more than 30 cattle per shipment no more than seven days before interstate movement.

In May 2026, both Texas and Utah received lactating dairy cattle from Idaho that had met the 30-cow individual sampling requirement with negative test results. However, other cattle in those shipments were infected at the time of movement, subsequently resulting in H5N1 infection in the receiving dairy herds.

A USDA Technical Brief[2] states that there is a 70 percent probability of detecting HPAI using bulk tank milk samples in the week before the onset of clinical signs. The same brief states that "testing individual dairy animals to determine HPAI virus exposure of herds is time and cost inefficient, particularly in the early phases of infection, when few cows are infected." An ongoing study[3] by Dr. Chloe Stenkamp-Strahm and Dr. Jason Lombard involving six affected dairies in California found that, of the 220 healthy, sick, or fresh cows sampled, only 12.7 percent of individual milk samples were positive for HPAI, and all positive samples were from sick cows. In a previously published study,[4] clinical signs of HPAI were observed three to 14 days after initial detection in bulk tank milk samples. The low proportion of individual cow milk samples testing positive for HPAI supports "the notion that [bulk tank milk] testing is more sensitive than individual animal testing for virus early in an outbreak…." In accordance with the USDA Dairy Herd Status Program appendix, a bulk tank milk (BTM) sample should consist of representative sample(s) from the bulk tank(s), tanker(s), or silo(s) for each bulk tank emptying over a 24-hour period or a single collection cycle, whichever is longer.

On August 5, 2026, Dr. Alex Hamberg, on behalf of the National Assembly of State Animal Health Officials, submitted a letter to Dr. Alan Huddleston requesting revisions to the USDA-APHIS movement guidance for lactating dairy cattle. The letter requested elimination of the requirement to individually test 30 cows and, instead, proposed requiring exporting dairies in states with "Provisionally Unaffected" or "Affected" NMTS status to obtain two negative PCR test results from bulk tank milk samples collected a minimum of seven days apart within 14 days before shipment.

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[1] APHIS Requirements and Recommendations for Highly Pathogenic Avian Influenza (HPAI) H5N1 Virus in Livestock For State Animal Health Officials, Accredited Veterinarians and Producers May 14, 2024, updated January 21, 2026

[2] USDA APHIS Technical Brief: Estimating the Probability of Highly Pathogenic Avian Influenza Detection in Bulk Tank Milk at Various Sampling Times Using Disease Event Surveillance Data. https://www.aphis.usda.gov/sites/default/files/tech-brief-hpai-btm-surveillance.pdf

[3] Stenkamp-Strahm, et al. Individual-animal testing for Highly Pathogenic Avian Influenza H5N1 during early outbreaks in six California dairy herds. *(In progress).*

[4] Stenkamp-Strahm, et al, Influenza A Virus detection in Bulk Tank and Pen Level Milk from Dairies Affected by Highly Pathogenic Avian Influenza H5N1. https://doi.org/10.1101/2025.10.26.25338833.