

AD HOC COMMITTEE (USDA ACTIVITIES) REPORT

November 21, 2013

Introduction

On May 30, 2013, NPGA Business Manager Dori Lowell received a letter in the mail from Diane Sutton (USDA/APHIS/VS – National Scrapie Program Coordinator) which contained the following text:

“MEMO FROM:
Diane L. Sutton
National Scrapie Program Coordinator
National Center for Animal Health Programs
Veterinary Services

“It has come to our attention that some goat registries are allowing the use of RFID implants for registry purposes that are not compliant with ISO standards 11784 and 11785. These standards require RFID implants for animals to be 15 digits including a 3 digit country or manufacturer code and to read at 134.2 kHz. While APHIS does not regulate what registries may use to identify goats for registration, it does determine what devices can be used for official identification in order for a registered goat identified with an RFID to move in interstate commerce without any other form of official identification, such as an eartag; guidance provided by APHIS in 2011 specified that implants need to comply with the above ISO standards in order to be used as official identification.

“This guidance has been updated and is available online at:
http://www.eradicatescrapie.org/Educational%20Resources/pdf/EID_microchip_as_official_ID.pdf

“Rather than disrupt stakeholder activities, APHIS has elected not to enforce the requirement that an implant be ISO compliant in order to be used as official identification until March 11, 2014. This decision is consistent with the new traceability rule requirement for horses.

“This means that any implant applied after this date not compliant with ISO standards 11784 and 11785 (15 digits including a 3 digit country or manufacturer code and readable at 134.2 kHz) will not be acceptable as official identification. Further, any implants applied after March 11, 2015 will have to have the 840 country code, rather than a manufacturer code, in order to be used as official identification and will have to be approved by APHIS for use in goats.

“Implants applied before these dates will be acceptable as official identification for the life of the animal as long as the other requirements are met. A list of approved 840 implant and official eartag manufacturers is maintained at:
http://www.aphis.usda.gov/animal_health/animal_diseases/scrapie/approved-tag-co.shtml”

It should be noted that the term RFID (Radio Frequency Identification) refers to the technology used in our microchip identification devices. The term “RFID implants” is another term for microchips.

On September 11, 2013, NPGA President April Seiler contacted me about chairing an NPGA Ad Hoc Committee dealing with all aspects of official livestock, premise, and flock identification, and all related matters regulated by USDA. The committee is to be known as the *Ad Hoc Committee on USDA Activities*. On September 15, 2013, after receiving my acceptance of her offer, President Seiler advised me that I would report to both the NPGA President and Vice President and copy the Chair of the Health, Education and Research Committee on all reports.

ISO Compliant RFID Devices

The International Organization for Standardization (ISO) is a worldwide federation of national standards bodies from more than 160 countries, one from each country. ISO is a non-governmental organization established in 1947 and based in Geneva, Switzerland. Its mission is to promote the development of standardization and related activities in the world with a view to facilitating the international exchange of goods and services, and to develop cooperation in the spheres of intellectual, scientific, technological and economic activity. ISO's work results in international agreements which are published as International Standards and other types of ISO documents.

The American National Standards Institute (ANSI) is the sole U.S. representative and dues-paying member of the International Organization for Standardization (ISO), and as a founding member of the ISO, ANSI plays an active role in its governance. ANSI is a private, nonprofit corporation, and tax exempt under IRC 501 (c) (3).

What are ISO standards 11784 and 11785? Per the American Veterinary Medical Association, the International Standards Organization (ISO) standards 11784/11785 were implemented in 1996. They are accepted by Canada, Europe, Asia, and Australia, and have been endorsed for use in the United States by the American National Standards Institute (ANSI). ISO standard 11784 defines the structure of the microchip information content, and standard 11785 determines the protocol for scanner-microchip communication.

Additionally, USDA has determined that ISO 11784/11785 compliant RFIDs must be 15 digits in length including a 3 digit country or manufacturer code, and read at 134.2 kHz.

USDA Approved RFID Vendors

As shown on page 1 of this report, the most recent list of vendors (as of 10/30/13) is maintained at:

http://www.aphis.usda.gov/animal_health/animal_diseases/scrapie/approved-tag-co.shtml

Procedures for Ordering RFID Devices

Individual Buyers

To order RFID implants (microchips) from a USDA-approved vendor, individual buyers must have a Scrapie Program Flock Identification Number, also known simply as a Flock ID, and a National Premise Identification Number or Location Identification Number.

Flock ID: Associated with a group of animals and moves with the animals if they are sold as a flock.

NPIN/LIN: Standardized premise or location ID number associated with the address and remains with the location if the property is sold.

Since it varies from state to state whether the State Veterinarian's Office or the USDA Veterinary Services Office issues these numbers, this procedure should be followed:

- To get a Flock ID or to make sure that your PIN or LID has been recorded in the Scrapie National Database, call toll free 1-866-873-2824. Make sure that you provide your PIN or LID to this office for entry into the Scrapie National Database so that the RFID device vendor can access it. (The Vendor will register your purchased microchips to you in this database by using your Flock ID and PIN/LID.) The above toll free number is answered by the officials whether State or Federal that are responsible for issuing Flock IDs in your state (for this to work, your phone must have one of your state's area codes). If you do not have a phone with one of your state's area codes or for some other reason the line does not work, you can call direct to either the State or Federal office listed at the links below for your State and they will assist you or refer you to the correct office.
 - Contact information for State Veterinarian's Offices is listed at <http://www.usaha.org/Portals/6/StateAnimalHealthOfficials.pdf>
 - Contact information for USDA Veterinary Services Offices are listed at http://www.aphis.usda.gov/animal_health/area_offices/

- In many cases, the office that issues Flock ID can also issue a PIN or LID; if not, they will refer you to the correct office for your state.

Bulk Purchases by Clubs/Associations

Clubs or Associations can get a non-producer NPIN by emailing the ADTIS helpdesk at ADTIS.help@aphis.usda.gov. The club or association will need to designate a specific person to be responsible and that person will need to get a level 2 e-authentication which requires going to the responsible USDA office in their area and presenting photo identification. For more information on getting e-authenticated, go to: <https://www.eauth.usda.gov/MainPages/eauthHelp.aspx>. The club or association will also need to get the RFID implant provider to agree to provide them implants for redistribution. Since AVID EZID is the only vendor currently approved for sheep/goats, they would have to select the bulk purchaser in the USDA's Animal Identification Management System (AIMS) and "ship" the implants to them in the system. The responsible association person would then need to go into AIMS and redistribute the implants to the appropriate member's herd using their Flock ID and PIN/LID numbers.

Regulation Guidance

There are two USDA Regulations which directly impact pygmy goat owners who move their goats interstate: Animal Disease Traceability Program (9 CFR 86), and National Scrapie Eradication Program (9 CFR 79).

Animal Disease Traceability Program

After many years of trying to develop and adopt regulations that would satisfy both the needs of USDA and be palatable to the livestock producing industry with respect to tracing diseased animals back to their herds of origin, the USDA finally published a series of regulations in the Federal Register, Vol. 78 No. 6, on January 9, 2013. These regulations amended Title 9 of the Code of Federal Regulations, Parts 71, 77, 78 and 86 to establish minimum national official identification and documentation requirements for the traceability of livestock moving interstate. In the introductory remarks and analysis appearing in the Federal Register, the following statement appears: "While the rule applies to cattle and bison, horses and other equine species, poultry, sheep and goats, swine, and captive cervids, the focus of this analysis is on expected economic effects for the beef and dairy cattle industries. These enterprises are likely to be most affected operationally by the rule. For the other species, APHIS will largely maintain and build on the identification requirements of existing disease program regulations" (emphasis mine). Parts 71, 77 and 78 of Title 9 are not relevant to this discussion and will not be further referenced. Part 86 of Title 9 will be the central reference point.

Title 9 of the Code of Federal Regulations, Part 86 contains the following sections:

§86.1: Definitions. Terms such as Animal Identification Number (AIN), Covered Livestock, Interstate Certificate of Veterinarian Inspection (ICVI), Interstate Movement, Officially Identified, and Premise Identification Number are defined in this section. They are quoted here for easy reference (some entirely, some excerpted):

AIN: A numbering system for the official identification of individual animals in the United States that provides a nationally unique identification number for each animal. The AIN consists of 15 digits, with the first 3 being the country code (840 for the United States or a unique country code for any U.S. territory that has such a code and elects to use it in place of the 840 code). The alpha characters USA or the numeric code assigned to the manufacturer of the identification device by the International Committee on Animal Recording may be used as an alternative to the 840 or other prefix representing a U.S. territory; however, only the AIN beginning with the 840 or other prefix representing a U.S. territory will be recognized as official for use on AIN tags applied to animals on or after March 11, 2015. The AIN beginning with the 840 prefix may not be applied to animals known to have been born outside the United States.

Covered Livestock: Cattle and bison, horses and other equine species, poultry, sheep and goats, swine, and captive cervids.

Interstate Certificate of Veterinary Inspection: (excerpted) An official document issued by a Federal, State, Tribal, or accredited veterinarian certifying the inspection of animals in preparation for interstate movement. (a) The ICVI must show the species of animals covered by the ICVI; the number of animals covered by the ICVI; the purpose for which the animals are to be moved; the address at which the animals were loaded for interstate movement; the address to which the animals are destined; and the names of the consignor and the consignee and their addresses if different from the address at which the animals were loaded or the address to which the

animals are destined. Additionally, unless the species-specific requirements for ICVIs provide an exception, the ICVI must list the official identification number of each animal, except as provided in paragraph (b) of this definition, or group of animals moved that is required to be officially identified, or, if an alternative form of identification has been agreed upon by the sending and receiving States, the ICVI must include a record of that identification.... An ICVI may not be issued for any animal that is not officially identified if official identification is required. If the animals are not required by the regulations to be officially identified, the ICVI must state the exemption that applies (e.g., the cattle and bison do not belong to one of the classes of cattle and bison to which the official identification requirements of this part apply). If the animals are required to be officially identified but the identification number does not have to be recorded on the ICVI, the ICVI must state that all animals to be moved under the ICVI are officially identified...

Interstate Movement: From one state into or through any other State.

Officially Identified: Identified by means of an official identification device or method approved by the Administrator.

Premise Identification Number: (excerpted) A nationally unique number assigned by a State, Tribal, and/or Federal animal health authority to a premises that is, in the judgment of the State, Tribal, and/or Federal animal health authority a geographically distinct location from other premises...

§86.2: General Requirements for Traceability

§86.3: Recordkeeping Requirements

(a) Official identification device distribution records. Any State, Tribe, accredited veterinarian, or other person or entity who distributes official identification devices must maintain for 5 years a record of the names and addresses of anyone to whom the devices were distributed.

(b) Interstate movement records. Approved livestock facilities must keep any ICVIs or alternate documentation that is required by this part for the interstate movement of covered livestock that enter the facility on or after March 11, 2013. For poultry and swine, such documents must be kept for at least 2 years, and for cattle and bison, sheep and goats, cervids, and equines, 5 years.

§86.4: Official Identification

(a) Official identification devices and methods. The Administrator has approved the following official identification devices or methods for the species listed. The Administrator may authorize the use of additional devices or methods for a specific species if he or she determines that such additional devices or methods will provide for adequate traceability.

(4) Sheep and goats. Sheep and goats that are required to be officially identified for interstate movement under this part must be identified by a device or method authorized by part 79 of this chapter.

(b) Official identification requirements for interstate movement.

(2) Sheep and goats. Sheep and goats moved interstate must be officially identified prior to the interstate movement unless they are exempt from official identification requirements under 9 CFR 79 or are official identified after the interstate movement, as provided in 9 CFR part 79.

§86.5: Documentation Requirements for Interstate Movement of Covered Livestock

(a) The persons responsible for animals leaving a premises for interstate movement must ensure that the animals are accompanied by an interstate certificate of veterinary inspection (ICVI) or other document required by this part for the interstate movement of animals.

(d) Sheep and goats. Sheep and goats moved interstate must be accompanied by documentation as required by part 79 of this chapter.

National Scrapie Eradication Program (NSEP)

This is a **mandatory** program that began in 2001 and remains in effect. With a few exceptions, this program requires sheep and goats to be officially identified before leaving the owner's property, even if just for a brief show or exhibition. The main purpose of this program is to provide trace back capabilities in the event of a Scrapie outbreak. In addition to identifying the animals, producers are required to keep general records for five years (births, deaths, sales and acquisitions).

The Scrapie Flock Certification Program (SFCP) is a **voluntary** program which is part of the National Scrapie Eradication Program. The SFCP requires those who voluntarily participate to maintain more detailed records than the NSEP and have annual inspections conducted by a State or Federal animal health official. Further requirements restrict the comingling of sheep/goats with animals outside the SFCP, and reporting all dead animals for possible Scrapie sampling.

After five years, producers in the SFCP are eligible to become a Certified Flock if all requirements have been met. There is also a special category within this program for producers who wish to export sheep or goats to another country.

The regulations for the National Scrapie Eradication Program can be found in Title 9 of the Code of Federal Regulations, Parts 54 and 79. These two parts contain regulatory information as follows:

Part 54 – Control of Scrapie

§54.1	Definitions
§54.2	Cooperative Agreements and Memoranda of Understanding with States
§54.3 thru §54.11	Scrapie Indemnification Program
§54.20 thru §54.22	Scrapie Flock Certification Program (SFCP)

Part 79 – Scrapie in Sheep and Goats

§79.1	Definitions
§79.2	Identification of Sheep and Goats in Interstate Commerce
§79.3	General Restrictions
§79.4	Designation of certain animals and flocks; notice to owners
§79.5	Issuance of Certificates
§79.6	Standards for States to qualify as Consistent States
§79.7	Waiver of Requirements for Scrapie Control Pilot Projects

What's Next?

Flock and Premise/Location Identification Numbers

Goat owners planning to transport their animals interstate for any reason, or intrastate to shows, must obtain both a Flock Identification Number and a Premise/Location Identification Number if you plan to acquire and implant RFID devices in your animals.

Official Identification of Animals

The usual identification methods for NPGA-registered pygmy goats are tattoos or microchips. With respect to tattoos, 9 CFR 79.2 (a) (2) (iv) authorizes: "Legible official registry tattoos that have been recorded in the book of record of a sheep or goat registry association when the animal is accompanied by either a registration certificate or a certificate of veterinary inspection..."

As for microchips, the following regulations are effective as follows:

- Up through March 10, 2014: Pre-ISO compliant microchips applied by this date will be acceptable as official identification for the life of the animal as long as the other requirements are met.
- Between March 11, 2014 and March 11, 2015: Any microchip applied between these dates must be ISO 11784 and 11785 compliant (15 digits including a 3 digit country or manufacturer code and readable at 134.2 kHz).
- On and after March 12, 2015: Same as between March 11, 2014 and March 11, 2015, except that the first three digits must be the 840 country code rather than the manufacturer code.

The only USDA-approved vendor for RFID implants for sheep and goats, EZID LLC, has both the new AVID microchip transponder implants and scanners.

Interstate Certificate of Veterinary Inspection Requirement

This requirement is outlined in 9 CFR 86.1, which is excerpted on pages 3-4 of this report. At this writing, USDA is pursuing the development of a standard ICVI form for use in all states since such standardized form does not now exist. In the meantime, USDA is prescribing the information which must be included on whatever form is used. See 9 CFR 86.1 for details.

Recordkeeping

Records must be kept for 5 years after the animal is sold or otherwise disposed. Ideally, producers should keep records in an electronic format, such as a Microsoft Excel spreadsheet. The record must contain the following information:

- Official identification number (complete registry tattoo number or RFID implant number)
- Breed

Sex
Date official identification number was applied
Date animal acquired
Name/address of previous owner (if applicable)
Date sold
Name/address of buyer

Sources

USDA/APHIS/VS, Riverdale, MD – Vincent C. Chapman Jr, Animal Disease Traceability Program Analyst, (301) 851-3436
Vince.C.Chapman@aphis.usda.gov

USDA/APHIS/VS, Riverdale, MD – Diane L. Sutton, DVM, National Scrapie Program Coordinator, (301) 851-3509
Diane.L.Sutton@aphis.usda.gov

USDA/APHIS/VS Area Office for CA, NV, HI, Sacramento, CA – Linda Craig or Dave Taillon, (916) 854-3950
VSCA@aphis.usda.gov

EZID Livestock Identification, Elsie McCoy, Customer Service & Sales Manager, (877) 330-EZID
Elsie@EZidAvid.com or ezidelsie@aol.com

Ray Hoyt
Chair