

Report from Texas Meeting on Bovine Tuberculosis

Austin, Texas

December 11, 2008

The Animal and Plant Health Inspection Service held a series of public listening sessions on the future of the national bovine tuberculosis (TB) program. In attendance were various State agriculture and wildlife officials, industry representatives, producers, public health officials, and members of the general public. This document summarizes comments and suggestions from focus group sessions at the Texas meeting (held December 11, 2008), public comments from the meetings, and written comments to USDA officials.

Description of Respondents

Representation at Meeting

9	State Agriculture
8	Producers
0	Wildlife Officials
7	Industry Representatives
1	Public Health Officials
<u>6</u>	<u>Other</u>
31	Total

Public Comments

Bob Hillman, Texas State Vet

Written Comments

Alejandro Ramirez, Chihuahua Animal Health Commission
Beverly Brewer, Oklahoma Department of Agriculture

Biosecurity

APHIS Summary/Interpretation of Comments and Suggestions:

We need to prevent the commingling of Mexican (including event) cattle and U.S. cattle, as well as breeding and replacement cattle. There is a general lack of understanding of what problems are occurring in regard to biosecurity, specifically: the definition of a feedlot, just how much separation between cattle is needed, and what is considered risky behavior. There is a need for an education and outreach program to address some of these misunderstandings and improve producers' practices.

There is a need for a two or three-tiered feedlot system. This system would include the following: (Category I) approved feedyards where exposed/restricted cattle for slaughter are fed, (Category II) terminal feedyards where exposed/restricted cattle cannot be fed and slaughter-only cattle are fed, and (Category III) multi-purpose feedyards where high-risk cattle would not be accepted.

Comments from focus groups

- Biosecurity should start with feedlots. We need to go to feedlots. Don't presume they will come to you.
- The beef industry doesn't understand biosecurity, especially as it relates to isolating new herd members.
- Many participants in focus groups were in favor of the three-tier concept.
- "Feedlot" should be defined as a dry lot for grazing where all cattle are terminal.
- Risky behavior is occurring because of financial burden of compliance. There was some disagreement, as another member felt that the risky behavior was tied more to ignorance on the part of the producers.
- It is difficult to change producer practices. Texas looked at creating "approved pastures" which would have been double-fenced and inspected by a State Agriculture inspector. It was not implemented due to the high cost to producers and the State.
- Texas is now looking at an education program and single fencing requirement. The industry is ok with more biosecurity but would like to start with education first, before regulations are put in place.
- Address commingling of Mexican and native U.S. cattle through producer education and possibly regulations and industry management practices
- Emphasis on using money to mitigate risk through improved biosecurity:
 - Tiered feedlots;
 - Producer education.
- At feed yards, biosecurity loopholes should be eliminated or significantly reduced, including the handling of dairy culls that do not proceed directly to slaughter, for example. Risky commingling practices in the feedyard or other subsequent destinations should be avoided.

- States, producers, and feeding operations will ideally work together to promulgate a series of best practices, including voluntary biosecurity to reduce commingling of Mexican and domestic cattle, effective fence maintenance, clear documentation of animal management, etc. (Participants did not dispute that any of these practices would help, but it was difficult to ascertain if all participants considered this set of improvements to be sufficient).
- How much separation is needed? Oklahoma requires 30-foot separation for New Mexican cattle brought into the State; others also quoted the 30-foot standard.
- Address risk of Mexican cattle being commingled with native U.S. cattle; may not be able to affect change on the Mexican side of the border, so need to address biosecurity on the U.S. side.
- Feedlot owners can control what happens on the feedlot but not what owners do with their own cattle once they are removed from the feedlot.
- Industry needs flexibility to adjust to market prices; breeding animals sometimes go back to the farm after being fed on the lot.
- There is some concern in the industry regarding susceptibility of their herds across fence lines. Producers should have access to the disease status of neighboring feedlots (not sure if this could be a privacy issue).

Comments from public and written comments

- Stocker/Feeder Cattle. Prevent commingling with native U.S. breeding and replacement cattle.
 - Requires development and implementation of a system of notification and tracking from port of entry (POE) to subsequent destination States.
 - Requires retention of official identification.
 - Requires information and education effort for producers to recognize the danger of commingling and learn biosecurity practices that will effectively prevent disease transmission.
- Isolation in grazing and feeding channels.
- Effective monitoring and surveillance.

Suggestions from focus groups

- Have a tiered feedlot system. Some low-risk cattle could be backgrounded; high-risk cattle could not.
- Keep cattle in channels, i.e. stockers, slaughter etc.
- Look to Pasteurized Milk Ordinance for guidance.
- A participant reiterated the State's proposal to establish a three-tiered system of feedlots. Tier one would be feedlots that are known to handle infected animals; all animals from this feedlot would presumably go to slaughter. Tier two would have a "split status", i.e., this type of feedlot would handle infected/exposed cattle as well as noninfected/nonexposed cattle and procedures would be established and consistently followed to prevent commingling (with all infected/exposed animals going directly to slaughter). Tier three would handle zero M-branded (imported) cattle. (Participants expressed that feedlot representatives should

comment on this proposal; this small discussion group did not purport to adequately represent cattle feeders.).

- A suggestion was made for the cattle-related industries to publish best practices for biosecurity, similar to how other industries (for example, Construction) conduct outreach and educate. (State participants in this group added that Texas has generally tried to minimize formal rules and instead rely on industry incentives and voluntary approaches.)
- Requiring cattle to go only to slaughter after they leave the feedlot is one approach.

Suggestions from public and written comments

- In regards to event cattle: Require either a 60-day quarantine and retest after importation of event cattle, or test by USDA veterinarian at Port of Entry prior to importation. Require annual retest.
- Develop a three-tiered feedyard system.
 - Category I – Approved Feedyards - Feeding of exposed/restricted cattle for slaughter only; no provisions for pasturing or grazing; treat all cattle in feedyard as TB exposed; not considered a herd.
 - Category II – Terminal Feedyards - Cannot feed exposed/restricted cattle; animals fed for slaughter only; may be placed on pastures for grazing if not commingled with cattle not in finish-feeding channels; grazing cattle must return to feedyard for finish feeding and slaughter. No non slaughter destinations; if infection found, classify pen and adjacent pen as exposed, restrict to slaughter only; treat as feedlot, not a herd.
 - Category III - Multi-Purpose Feedyards - Not allowed to feed high risk cattle (i.e. cannot feed Mexican origin cattle); all animals entering must meet State entry requirements for breeding or replacement cattle, not feeder cattle; if infection found, treat as an infected herd.
- Perhaps not management of Mexican event cattle but not allowing Mexican steers anywhere but the stocker-feeder-slaughter chain (i.e. no commingling with native U.S. cattle).
- Develop two-tiered feed lot systems.
- Prevent commingling with native breeding and replacement cattle.
- If commingling with U.S. origin event cattle, all cattle assume the risk status of the highest risk cattle and should be treated as risk cattle for subsequent movements (Annual test).
- Effective monitoring and surveillance:
 - Identify the animals as Mexican origin on TB test charts and on Certificate of Veterinary Inspection (CVI).
 - Evaluate responder rates obtained by each accredited veterinarian.
 - Effective and efficient inspection and sampling at slaughter.
 - Collection of identification, including brand information, on both Mexican- origin and Canadian-origin animals at slaughter.

Control vs. Eradication

APHIS Summary/Interpretation of Comments and Suggestions:

Most participants indicated that eradication must be the goal of the program; however, with the importation of cattle from Mexico, many thought it would not be possible.

Comments from focus groups

- It would be a mistake to give up on the eradication goal.
- Must remain an eradication effort. Have spent 100 years trying to eradicate. If we don't try to eradicate, we will see TB spread. If we can stop bringing in new disease, U.S. can eradicate TB
- Eradication needs to be the goal.
- This group did not demonstrate consensus in responding to whether the TB program should seek to eradicate the disease versus control it and isolate infected animals/herds, but multiple industry group representatives expressed agreement with this statement: "We will never eradicate if we continue to import from Mexico."
- State Ag: Eradication should be the ultimate goal, but that may not be possible until we can control the primary TB source (Mexico). Buying out huge dairies is not the answer.
- Industry: Work toward eradication

Comments from public and written comments

- TB program goal needs to remain eradication.

Education and Outreach

APHIS Summary/Interpretation of Comments and Suggestions:

Many producers are not aware of the existing problems, such as backgrounding of cattle and commingling of herds, and education from either the industry or States is needed. Some suggestions on how best to provide that education include utilization of extension offices/agents, feeder education programs, and farm to fork programs. Continuing education of veterinarians and increasing the number of hours for veterinary accreditation or taking action against those who do not perform within the standards were also seen as issues needing to be addressed. Monitoring caudal fold test (CFT) rates and developing a uniform interpretation of the test were also mentioned.

Comments from focus groups

- Many dairy producers are not aware of the risk of commingling. They often don't know how to recognize poor biosecurity or how to mitigate the risk.
- States should support feeder education programs so producers understand how to mitigate risks.
- Continuing education for veterinarians is paramount. Veterinarians are only given two hours per year for accreditation; students must learn that they are partners with APHIS' Veterinary Services (VS).
- Industry should be involved in education and funding, but TB is not high on their radar.
- Many producers think TB is no longer an issue. They don't believe it's a problem.
- Education about what producers should do to protect themselves should be high priority, but it is hard to get producers to read the literature.
- Need to figure out how to get the word out—better education. Some owners don't know that there is a risk associated with housing cattle next to suspect herds.
- Utilize extension agents/offices for education.
- Better continuing education opportunities are needed.
- Provide better education on problems.
- Many producers are not aware of the problem.
- Much of the feedlot/backgrounding issue could be solved through education.
- Improvements in veterinary professionalism—specifically, more consistent interpretation of the caudal fold test for TB—will ideally inform how private veterinary practitioners conduct this important test in both the U.S. and Mexico. Presently, about half of the U.S. is conducting this test in a uniform manner; the figure may be similar for veterinarians in Mexico. Accredited veterinarians on both sides of the border face pressure from their clients due to the high dollar consequences of the test result.
- Most don't understand what "backgrounding" is.

Comments from public and written comments

- USDA should provide education to both producers and veterinarians.
- USDA should explore a voluntary producer-oriented farm-to-fork food safety program that incorporates TB.
- Ensure all States effectively monitor CFT rates by accredited veterinarians and take appropriate accreditation actions against those who do not perform within the established standard.

Funding

APHIS Summary/Interpretation of Comments and Suggestions:

The program is not adequately funded and is currently being funded at 25% of the recommended level.

Comments from focus groups

- Industry/producers rely too much on the Federal government, and the money is not there anymore.

Comments from public and written comments

- The second major failure is the failure of USDA and Congress to adequately fund the bovine TB eradication program. The program is currently funded at less than one-half the level recommended in 1995 for full implementation of all components of the program. The program is funded at approximately 25% of the funding level recommended in the last strategic planning process.

Imports and Mexican Cattle

APHIS Summary/Interpretation of Comments and Suggestions:

Some Mexican States are doing well; however, there is still a need to provide more assistance to some States and a need for more frequent reviews of those States. When teams are sent to Mexico for review, it is important that they are able to speak Spanish, and perhaps a permanent review team may be needed. Better import notification to producers who may not be aware they are purchasing cattle from Mexico is needed; cattle from Mexico arrive with identification that is removed at the border. It was suggested that tighter rules may need to be placed in regards to importation of Mexican cattle, and that those rules should be followed through.

Comments from focus groups

- Need more frequent reviews of Mexican States.
- Many producers want Mexican cattle. Most of these Mexican imports are feeder cattle; U.S. producers want that source of cattle.
- Industry should be more involved. American ranchers are independent. Industry should help foot the bill. Maintain a consistent line of communication—whether formal or informal.
- Teams sent to Mexico sometimes have little to no experience, nor do they speak Spanish.
- Mexico has more control than the United States. Movement control is very important. U.S. representatives are invited to look at the system for movement control that is currently being used in Chihuahua.
- Address issues with Mexican imports.
- Also, keep up progress in—as well as the pressure on—Mexico.
- U.S. reviews still finding problems with Mexican program; Mexico’s Secretariat of Agriculture, Livestock, Rural Development, Fisheries and Food (SAGARPA) (SAGARPA) should be finding those issues before the U.S. does a review.
- Numbers of feeder cattle coming from “TB-free States” are inconsistent with cattle populations in those Mexican States.
- Trust issue.
- Some Mexican States are doing well.
- If Mexico is doing what it should be doing, we should see fewer cattle with lesions coming from Mexico.
- Continue to push the 5-year strategic plan with Mexico; don’t allow any modification.
- Be careful not to impose restrictions on Mexican cattle that are not imposed on U.S. cattle (i.e., using radio frequency identification devices(RFID))
- Provide more assistance to Mexico. It was noted that the U.S. has provided support over time including setting up laboratories and providing training. Some Mexican States need on the ground assistance.

- Improve import notification. Producer may not know they are getting Mexican cattle. Animals are individually identified at the border but identification may be removed after they cross the border.
- A producer reported that lots of information arrives at the border with Mexican cattle, but that information is not passed along as the animal moves away from the border; we need to find a means (electronic) for the information to follow the shipment.
- USDA is supposed to notify destination States when animals are coming to the State. This is challenging as the destination may be a broker in Texas or New Mexico, and from there the animals are dispersed with no notification.
- Oklahoma requires permit and individual identification for Mexican cattle entering the State, but State officials know that not everyone calls and gets a permit.
- Industry speculated that fewer Mexican cattle would be imported because of Country of Origin Labeling (COOL); concern that the price of Mexican cows will decrease so there may be less demand. COOL may also force more separation between Mexican and other cattle. COOL could also lead to more fraud with tags being removed.
- Tighter rules on importation of Mexican cattle.
- An industry group representative suggested, and discussion ensued, that perhaps USDA should stop cattle imports from Mexico if indeed cattle from Mexico are the primary source of new TB infections here and the number of infected cattle being imported is too high (with the United States apparently unable to prevent this). Participants from the State and other industry groups did not generally see import restrictions as feasible given that Mexican cattle are meeting a huge demand in the United States. A State representative said that better rules would be preferable and more feasible than restricting Mexican imports.
- The question was raised as to why cattle being imported from Mexico (that received a skin test in Mexico before shipping) cannot receive a blood test when they arrive at the U.S. border? (Observer noted that the U.S. ports run by APHIS would be unable to hold large numbers of animals for extended periods; one industry group representative cited a study that estimated a cost of about \$8 per head for such testing, and several participants said this cost would be prohibitive.)

Comments from public and written comments

- A major failure is the failed USDA rules and policy on importation of cattle from Mexico, which allows hundreds to thousands of TB exposed and infected steers entry into the United States. They're then released without any mitigation steps to prevent transmission of disease to native U.S. cattle. We must stop unrestricted importation of infected and exposed Mexican-origin cattle.
- Improved biosecurity on imported Mexican origin cattle.
- All Mexican-origin cattle should be permanently, individually identified with a country-of- origin official RFID device prior to importation. All records should be correlated to the RFID tag.

- Isolation of Mexican-origin stocker cattle in grazing situations.
- Look at new management strategies for the control of Mexican imports – especially regarding the commingling of animals in the stocker-feeder-slaughter chain with breeding or event cattle.
- Trade is very important for both countries. We need to continue working together to eradicate TB.

Suggestions from focus groups

- Ensure Mexico is following through on their rules and program.
- Suggest implementing a permanent USDA review team for Mexico. If they come in the stock, feeder, or slaughter channel, they should stay in that channel. Right now, the ability to track cattle coming in from Mexico is broken. They don't stay in the channel. They may offload/divide down the line (after crossing into the U.S.), then become Texas cattle.
- Best practices should be instituted at the State level; increase accountability of accredited vets.
- Push electronic database transfer and storage.
- Rather than closing the border, institute biosecurity/risk mitigation strategies and make producers/industry responsible for our own business plan.

Suggestions from public and written comments

- Need to develop and implement a mechanism for notifying the destination States of Mexican-origin cattle so that producers and officials in receiving States can take appropriate cautionary steps to prevent commingling.
- Conduct regular (maybe annual) inspections of Mexican States that are approved to export cattle into the United States.
- Hold Mexico accountable for full implementation of the five-year plan to ensure implementation of effective TB programs in each State that exports cattle to the U.S.
- Revamp our stocker and feeder cattle systems to reduce the potential for exposure of native breeding and replacement cattle to Mexican origin cattle.
- Require retention of official Mexican-origin identification, provide effective penalties for removal of identification (or failure to re-identify and correlate identification when identification is lost).

Indemnity/Depopulation

APHIS Summary/Interpretation of Comments and Suggestions:

Whole-herd indemnity is neither a feasible nor a sustainable option. It was suggested that additional funding to pay (indemnify) the actual animal cost is needed, as is returning to test-and-removal procedures. Also, lower indemnity should be paid for higher risk animals. As a marketing tool, processing plants could stop accepting exposed cattle to increase industry compliance.

Comments from focus groups

- Whole-herd indemnity is not good; it's too expensive. We need better funding to cover the actual animal cost. Genetic fingerprinting is a good idea. Greatest risk is that States do not fully realize the extent of the problem. Some of the burden of eradication should be borne by industry. Industry has to "step up to the plate." Some processing plants don't accept exposed cattle, which could be used as a marketing tool to increase industry compliance.
- Penalize those people willing to assume higher risk, i.e. they get lower indemnity if they buy backgrounded cattle.
- Depopulation, or test-and-remove? Test-and-remove can be difficult for large dairy herds but it may be difficult to have funds to depopulate large dairy herds. Slaughterhouses will pay less for a TB-affected herd; the value of the cattle collapses so, without indemnity, the producer may go broke. Potential solutions: industry funded pools such as dairyman pool could bridge gaps; charge a \$1.00 fee for Mexican-origin cattle and use those funds to supplement program dollars.

Comments from public and written comments

- Depopulation of herds with single or few infected animals, while desirable from a purely disease eradication perspective, has never been economically feasible and certainly cannot be sustained in this day of tight and shrinking budgets. We need to go back to test-and-removal procedures rather than insisting that all infected herds be depopulated. This will necessitate a change in the way we classify States.

Regulations

APHIS Summary/Interpretation of Comments and Suggestions:

The Federal rulemaking process is seen as broken. Improvements to the Uniform Methods and Rules (UM&R) and the Code of Federal Regulations (CFR) have not been incorporated into the program and implemented, and because of this, they are now outdated. It was suggested that international and domestic rules be re-evaluated and updated because of the length of time passed. The new UM&R and CFR must be flexible, informative, fast, intelligible, and not punitive in nature. Additionally, the regulations must address the differences in dairy and beef cattle and domestic and Mexican cattle.

Comments from focus groups

- Regulations should not penalize States so harshly. There was much agreement on this point. Don't be punitive or industry will "run backwards." Much of the group favored some sort of three-tiered approach. Need a clear definition of "feedlot."
- The CFR and UM&R should be tied together because the UM&R has some good recommendations built into it that didn't make it into the CFR. The rulemaking process should be sped up; don't take three to five years to finalize rules.
- State would like to put certain time on when regulations would kick in.
- Need different rules for dairy versus beef. There are many examples of dairy heifers being housed on feedlots next to used up rodeo steers or Mexican cattle.
- The CFR and UM&R need to be more efficient so that things/changes can occur quickly when needed. They're currently too restrictive and cumbersome.

Comments from public and written comments

- The national Bovine Tuberculosis Eradication Program in the United States is based on sound science and collective, experienced reasoning. The primary tenets of the program are valid. However, recommendations for improvement to both the UM&R and the CFR are not being implemented. We do not need to rebuild the program; we need to adjust application of program elements to meet the changing risk factors.
- The Bovine Tuberculosis Eradication Program has undergone several reviews since the mid-1990s through comprehensive strategic planning processes. These reviews identified areas in need of improvement and made recommendations for incorporation of changes to both the UM&R and the CFR. Many of the UM&R recommendations have not been incorporated in order for the program. Few of the recommendations for improvement to the CFR have been implemented because they are tied up in the long-awaited international and domestic proposed rules.

- The Federal rulemaking process is broken. We have been waiting for years for USDA to publish proposed rules for importation of cattle into the U.S. from Mexico (international rule) and proposed rules for operation of the TB program within the U.S. (domestic rule). If these proposed rules had been published and implemented when developed they would have gone a long way to address many of the issues that we are facing today.
- How can we expect anything but failure if we are unable or unwilling to implement the components that we all know must be incorporated in order for the program to be effective.
- Need flexibility and uniformity in the UM&R, Chapter 9 of the CFR, and international laws.

Suggestions from focus groups

- Must use more intelligible terms in re-writing the regulations.

Suggestions from public and written comments

- The long awaited international and domestic rules should be re-evaluated and possibly updated since it has been so long since development of the proposed rules.

Research

APHIS Summary/Interpretation of Comments and Suggestions:

There is a specific need for a new diagnostic test and vaccine for TB. USDA should be devoting funding to develop a better diagnostic test, and vaccine development should be considered especially for wildlife populations and Mexican and U.S. cattle.

Comments from focus groups

- Invest in research and development for a new diagnostic test.
- Accelerate work on vaccines and then apply vaccination to wildlife, Mexican cattle, and U.S. cattle, with priority on wildlife. Also, apply harvest strategies with wildlife to eliminate disease over time. Must address trade issues with vaccination for cattle. We would need an education campaign for people if we start to use vaccines.
- USDA should devote adequate funding to its Agricultural Research Service (ARS) or another appropriate entity to develop a modern diagnostic test to replace the caudal fold test.
- We would like to see risk-based epidemiology—how we look at the possibility/probability of spread.
- Genetic/DNA typing is fantastic.
- Better diagnostics, better field tests are needed.

Comments from public and written comments

- Support development of effective TB vaccines, especially for application to at-risk wildlife populations.

State Status

APHIS Summary/Interpretation of Comments and Suggestions:

A change is needed in the approach to handling State status. The current approach is too rigid, penalizes the producers, and creates a disincentive to the producer to identify more herds. The new program should be based on prevalence and risk. A better option would be the use of regionalization.

Comments from focus groups

- Address the State status issue.
- Consider prevalence and risk when determining State status.
- Fixed two-herd rule is too rigid and provides a disincentive to identify more herds; States should not lose status if they're doing all the work required.
- It does not make sense that Rhode Island and Texas are held to the same two-herd rule; cut off should be based on cattle population.
- Circle testing (testing every animal within a specified radius of an affected herd) is not sufficient for dairy herds; complete identification and traceability to address the large number of traces are needed. How big a circle? States and USDA already try to do the equivalent of circle testing but lose the trail due to lack of identification. End up testing many herds due to a lack of identification. (Brought up by State with lots of support from industry and others at the table.)
- Big problem is that the current system penalizes States.
- USDA should change its rule of classifying States according to the number of herds in the State determined to be affected with TB. It is highly illogical that, for example, "two herds in Maine are treated the same as two herds in Texas." This illogical classification system has economic consequences and would therefore be much better if it were based on prevalence and risk.
- There was support for the regionalization approach.
- Problem is that when a new TB case is found, the producer is penalized and loses status.

Comments from public and written comments

- State status must be based on prevalence and risk, not simply on a finite number of infected herds.
- State status should NOT BE PUNITIVE; look at demographics, risk based epidemiology.

Suggestions from focus groups

- Suggest using "buffer zones" (i.e., regionalization) rather than whole State status.
- Design a risk-based program.
- Consider buffer zone instead of State status.

- When classifying herds, consider classification scenario that is based on the number of herds; suggest using regionalization, rather than State status.

Surveillance

APHIS Summary/Interpretation of Comments and Suggestions:

USDA's APHIS and Food Safety and Inspection Service (FSIS) need to have jointly developed procedures and implement those procedures consistently in the slaughter surveillance for TB. This includes appropriate line speeds, completion of paperwork, and potentially hiring additional inspectors. The use of a serological assay for slaughter surveillance was also mentioned as a tool to alleviate the current hands-on system, as well as the collection of brand information on imported animals at slaughter.

Comments from focus groups

- Improve surveillance in feeder cattle. APHIS needs to work with FSIS; have FSIS indicate brands (especially M brands indicating Mexican origin cattle) on cattle their inspectors find with lesions.
- Improve slaughter surveillance by working to improve surveillance in feeder cattle.
- Improved surveillance in fat cattle would provide more information on true prevalence of TB coming from Mexico. Prevalence may be two to three times more than today's estimate. This could require slowing down slaughter lines or adding additional inspectors.
- At slaughterhouses, APHIS and FSIS personnel executing the TB program should speak and act with one consistent voice in overseeing how paperwork is completed, when enhanced inspections are required, and what logistics are acceptable. Today, such consistency is not present; existing standards are applied subjectively and inconsistently in various States.
- Also at slaughterhouses, USDA may need to seek a balance between high line speeds that support commerce, and the need to ensure that line speeds are not so fast that acceptable inspections cannot be accomplished.
- FSIS and APHIS should jointly and clearly decide, document, and implement consistent slaughterhouse procedures, including addressing when enhanced inspection is necessary, how the VS Form 1-27 will be used, how trucks will be sealed and unsealed, etc.
- Effective and efficient inspection and sampling at slaughter.
- Collection at slaughter of identification, including brand information, on both Mexican origin and Canadian origin animals.

Comments from public and written comments

- Availability of a serological assay for slaughter surveillance would also alleviate the need for "enhanced inspection" on groups of cattle from risk populations. The enhanced inspection process is resulting in discounts for the cattle and fewer plants willing to bid on the cattle.

Suggestions from focus groups

- Possibly pool inspectors from various agencies.

Suggestions from public and written comments

- Serological assays would also be beneficial for slaughter surveillance as a replacement for the current system based on hands-on inspection of carcasses at slaughter. While post-mortem inspection procedures and rates of granuloma submission have been dramatically improved for adult cattle plants, there has not been a corresponding improvement at fed cattle plants.

Testing

APHIS Summary/Interpretation of Comments and Suggestions:

There is a need for a better diagnostic test that is fast, accurate, requires less handling of cattle, and is easier to perform and read. The current test has a low responder rate and cattle are found at slaughter with lesions. Specific testing suggestions were listed, including using a blood test in dairy operations (even if just a screening test), using serological assays, and reinstating the Milk Ordinance test for 3 years, and using the ELISA test.

Comments from focus groups

- Surveillance testing is limited due to lack of sensitivity.
- Need better testing and money for better testing.
- A fast, accurate test that could be done at the border would help.
- Develop new diagnostic tests that are more accurate and require less re-working (handling) of cattle.
- Ensure testing is being done properly.
- Currently test millions of animals with very low responder rates yet continue to find cattle with lesions at slaughter; need to better apply caudal fold tests.
- Address the burden posed by testing requirements due to loss of State status.
- It's hard to test at market because it is difficult to hold the cattle over for a sufficient period of time.
- Implement a blood test even if it is just a screening test. Blood testing is well accepted in modern dairy operations, which already screen for many diseases.
- Money for the program should be focused more on reducing risk through better tests and better biosecurity in the short term, and less on buy outs and slaughter of herds. Long term, lets get rid of the disease.
- The TB program would benefit immensely from a better diagnostic test to replace the caudal fold test. A State representative noted that one company is seeking to develop a panel of serology tests that may potentially work for chute-side testing.

Comments from public and written comments

- Need improved diagnostic tests. The current primary test is almost 100 years old. While still effective as applied on a herd level, this test has never been a good individual animal test. We must develop and implement improved diagnostics to effectively eliminate TB from our herds and prevent continued reintroduction into the United States. Resources must be committed to research, development, and approval of new technologies.
- I believe that we need a better diagnostic TB field test for the TB eradication program to work in the U.S. and in Mexico. Otherwise the efforts will not yield good results.

- Consider reinstatement of the Milk Ordinance Test for dairy herds.
- Improve epidemiological investigation of lesioned cases to identify and test potentially exposed native cattle herds.
- The preferred testing platform would consist of a serological assay or multiple serological assays conducted in tandem. Serological assays would eliminate the necessity for handling cattle twice to complete the test.

Suggestions from focus groups

- Recommend using ELISA test similar to that used to test elephants for TB.
- Suggest we reinstate the Pasteurized Milk Ordinance Test—it's a 3-year required test for dairy (test whole herd every 3 years).

Suggestions from public and written comments

- Reinstate the Milk Ordinance testing at 3 years for all dairies.

Traceability

APHIS Summary/Interpretation of Comments and Suggestions:

The current traceability level is not sufficient and there is a need to improve the system through tools including animal identification and evaluation of how animal identification can support high risk animal movements. While some producers have moved toward the online system, it is seen as not user-friendly. There is a need for reporting and tracking that is easy, accurate and provides the producer confidentiality. For tracking purposes, eartags should not be removed at slaughter.

Comments from focus groups

- Must have traceability that is accepted by producers, market, feedlot, and producers.
- Some questioned what type of permanent ID is used on Mexican cattle?
- Some dairy producers have gone to all electronic identification, but vets have to submit notes transcribed by hand into the State's database.
- Online system is not user friendly because vets have to retype same address multiple times.
- We should make reporting and tracking easier/more accurate.
- Producers want to use electronic identification, but are hampered.
- There should be a way to transmit vaccination data from the eartag directly into database.
- Improve animal identification and traceability. As the U.S. quits testing for brucellosis, there's a struggle with replacing identification.
- Traceability, not just identification, is what is important.
- Without traceability, it's hard to know for certain where a TB case came from, i.e., contact with U.S. Holsteins or Mexican steers. (Brought up by State Ag with discussion by producers.)
- Need to improve traceability.
- Some incremental improvements in traceability should be occurring in the short-term. Currently, traceability is insufficient. It will probably remain unrealistic for anyone to expect that every movement and transaction is traceable, but we must begin to evaluate how animal identification can better support higher- and normal-risk animal movements. An industry group representative noted that ideally the USDA will have made a strategic decision during this time: is the goal 100 percent traceability with recognition that commerce will be slowed somewhat, or do we seek a system to cover the highest-risk aspects of the industry?

Comments from public and written comments

- ID of individual animals with traceability included in this electronic based data submission and transfer (surveillance, CVI, test charts, labels) that is user-friendly to include producer confidentiality.
- Require official permanent identification of all cattle moving in commerce in the United States. Our disease tracing system in the United States has been based on the brucellosis testing and vaccination tags for many years. This identification system has been failing at an increasing rate as States became brucellosis free and testing and vaccination were reduced then stopped. Today a low percentage of our breeding herd is identified with official identification devices. Even fewer of our steers and heifers are identified because they fall out of the identification requirements of the brucellosis program. Effective epidemiological evaluation and traceback of exposed cattle is difficult at best and in many cases is impossible because of the lack of an effective animal identification system. As a result, the source of TB infection is often not identified. The inability to identify a source of the disease guarantees that there will be more disease spread.

Suggestions from focus groups

- When tracking, track all the way; don't cut off ear tags at feedlot.
- Requiring brokers to supply destination information is one approach.

Miscellaneous

Comments from focus groups

- The group agreed that dairy producers are more aware of the danger of TB and have more control than beef producers. Dairymen understand the benefits of testing and ID and are, frankly, somewhat annoyed that beef producers are not as conscientious about reducing the TB risk. Many producers, especially beef producers, no longer see TB as a real threat due to the success of the program.
- USDA should establish minimum interstate movement requirements for high-risk animals, including testing for event and roping cattle. A near-term Federal order could require each State to have requirements for rodeo and event cattle; one suggestion was to require radio frequency identification and yearly testing by all States.
- TB risks are continually changing as the various components of our cattle industry modify their business and management practices in an effort to stay profitable. For the most part these risks have been identified and documented through the strategic planning processes and national animal health meetings, and mitigation strategies have been developed over the past number of years. What is lacking is implementation.
- Maintain open communication between Federal and State AVICs.

Comments from public and written comments

- I do not believe the TB program is broken. Implementation of the sound program components to bring the program up to meet the changing livestock industry practices and risk factors has been lacking.
- A major failure of the TB program is largely a failure to implement recommendations for enhancement of the Bovine TB Eradication Program which were aimed at addressing the new or changing risks.
- Communication and cooperation between Federal and State officials and Producers.

Roles and Responsibilities

Comments

- One disconnect with VS that may be fixed easily is the issue of who is protected. State epidemiologists are always “in town,” but Federal epidemiologists may not be. Some epidemiologists are great, but others disconnect with their responsibility to the State and State producers.
- The States need to play a more active role in the development of—and determining what’s going on in—the program.
- Greater efficiency and communication is needed.
- Producers should accept responsibility for what they want to happen.
- Recommend implementing a farm-to-plate food safety program.
- Let’s start with working on our rules/regulation and communication.
- Those who do not choose to comply should be penalized.
- Federal systems must be user-friendly.
- There are sometimes problems with being able to inform producers about what’s going on in the program.
- There was much agreement that the program should use terms that producers/cattle owners can understand. “Modified advance accredited” doesn’t mean anything to the producers.
- The vet on the ground should have the authority to make decisions.

Suggestions

USDA :

- Keep up pressure on Mexico. May need peer to peer pressure from USDA Secretary or possibly Secretary of State.
- Be “keeper of the standard.” USDA develops national strategy, UM&R standards for the program. Maintain leeway and discretion within UM&R.
- Gain input from industries/States, lots of good ideas out there

Industry:

- Cattle feeders: Examine management practices on feedlots and ways to prevent commingling of Mexican and native U.S. cattle (separation).
- Work with Congress to help get funding for research and development, not just for indemnity.
- Engage with Mexican program; American input is needed to keep the program moving forward.

State

- Apply program standards within their State
- Education
- State Vets need more active roles

Producers

- Education
- Need to fund part of the program

These summaries and points reflect the observations, opinions, and knowledge of listening session participants and other commenters. They are not fact-checked, nor do not they reflect the views of USDA.