



NATIONAL MEAT ASSOCIATION

1970 Broadway, Suite 825, Oakland, CA 94612
Ph. (510) 763-1533 or (202) 667-2108 • Fax (510) 763-6186
staff@nmaonline.org • <http://www.nmaonline.org>

December 9, 2011

Docket No. APHIS-2009-0091,
Regulatory Analysis and Development, PPD,
APHIS Station 3A-03.8,
4700 River Road Unit 118.,
Riverdale, MD 20737-1238

RE: Docket ID Docket No. APHIS-2009-0091
Federal Register, Thursday, August 11, 2011
Vol. 76, No. 155
Page 50082-50110

Dear FSIS Docket Clerk:

On behalf of the members of National Meat Association (NMA), we respectfully submit the following comments in response to the APHIS Proposed Rule, "Traceability for Livestock Moving Interstate."

Organized in 1946, NMA represents the interests of meat packers and processors throughout the United States. With approximately 225 general member companies, all of whom are under Federal Inspection, NMA has a vested interest in this Proposed Rule.

General Comments

NMA supports the slaughter of disease-free animals for the purpose of entering the food chain. In addition, NMA feels requirements for tracing movement of livestock interstate can only aid in limiting the spread of disease among livestock and in the production of higher quality food. The requirement that animals moving interstate be accompanied with an interstate certificate of veterinary inspection (ICVI), which must be issued by an accredited veterinarian authorized to perform work on behalf of APHIS or a Federal, State or Tribal veterinarian, should decrease the transportation of unhealthy animals. It is of great importance that animals moving interstate meet the appropriate animal health requirements.

Though ICVIs are an important step, the Proposed Rule should go further by requiring each head of livestock to have some form of individual identification number. This unique number should be on the ICVI. The National Uniform Eartagging System (NUES) or another animal identification number (AIN) would serve the purpose of traceability the best, as they provide a permanent form of identification. Temporary forms of identification of animals, such as backtags, would not perform the necessary level of identification for traceability. The ICVIs and any identification number should eventually be entered directly into a national database, where the information can be accumulated in a manner that is efficient and effective.

Many livestock are transferred multiple times; therefore, lesser forms of identification such as hot/iron branding, would not have any value to tie an individual animal to a specific ICVI. Further, herds of animals rarely stay together once they enter the marketplace, thus any kind of identification based on herd or group would not prove reliable down the line for those that slaughter the animals. A radio frequency identification device (RFID) would go farther in ensuring that the animal is correctly identified, while allowing industry to read and record at the speed of commerce.

Finally, an effective animal traceability program will benefit the American brand of meat products exported. As meat products produced in the United States would have the assurances of coming from livestock traceable to their ranch/farm of origin, consumers in international countries should have more confidence in purchasing American products. The requirement for livestock traceability is critical to certain export markets, and in some case the lack of a robust system is used as a trade barrier for U.S. products.

Short Term and Future Considerations

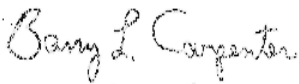
In the short term, NMA agrees with the APHIS Proposed Rule as stated. The goal is to have traceability in a system that is easy to use for producers and reduces barriers of compliance. Producers of livestock should be encouraged to utilize traceability. At this point, producers should have options such as group/lot identification number (GIN), RFID, AIN, NUES and other approved forms of identification. Presently, many heads of livestock are brought to slaughter facilities in groups/lots, so a GIN work for traceback to the same producers.

In the future, a traceback system is needed that will integrate all of the existing systems, such as RFID and NUES, and ensure a seamless transition into a single system/database. Therefore, eventually there is a system where veterinarians can input ICVIs directly into this system/database and eliminate the need of paper copies. APHIS should find a means to input the information into the system without using a clerk to input data into a database.

Conclusion

For the present, the APHIS Proposed Rule appears a reasonable step towards traceability. Though NMA feels APHIS has taken steps to improve traceability of livestock with this Proposed Rule, they should in the near future go farther. Traceability should encompass a means to traceback individual head of livestock to their herd with a unique identification number or device, and said requirements should be required of all cattle that are moved from their farm of origin. Livestock producers should have viable means to identify their animals, yet the forms of identification should clearly identify an animal individually. In order to market animals as healthy there needs to be a system to completely traceback to the individual animal.

Thank you for providing this opportunity to comment.



Barry Carpenter
CEO

Ken Mastracchio
Associate Director Regulatory

Satbir Bal
Regulatory Analyst