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Regulatory Analysis and Development, PPD, APHIS
Station 3A-03.8
4700 River Toad Unit 118
Riverdale, MD 20737-1238

Meetings: Animal Disease Traceability System

On behalf of the members of the Oklahoma Cattlemen's Association (OCA), I thank you for the opportunity to provide written comments regarding the USDA-APHIS hosted meetings relative to Animal Disease Traceability System (ADT). OCA members are family businesses with cow/calf, feeder and stocker cattle interests in all 77 Oklahoma counties. Our members' livelihood is profoundly affected by the USDA's Animal Disease Traceability rules. OCA Northwest District Vice President Jess Kane provide similar comments at the first ADT meeting held in Oklahoma City on April 11th.

OCA supports an animal disease traceability program that is chiefly administered by the states under the delegated authority of the USDA. OCA has been and will continue to work with the Oklahoma Department of Agriculture, Food and Forestry to this end. We appreciate the great working relationship that we have with ODAFF Animal Health officials such as Oklahoma State Veterinarian Dr. Rod Hall and his staff.

OCA supports a state administered ADT program, because no one is more concerned about the health and wellbeing of cattle than ranchers. However, the OCA has specific concerns about the ADT program, which our members believe should be addressed to ensure that the program is both efficient and effective. These concerns include:

- First and foremost, it should be recognized that the purpose of an ADT program should be animal disease surveillance, control and eradication. All information and data collected should be relevant to that purpose, and should be used only in connection with that purpose.
- The program must recognize the added cost to cattle ranchers and must work to achieve affordable implementation.
- The program must recognize the speed of commerce, and not adversely affect the marketability of feeder cattle.
- The program must be implemented with firm and unwavering commitment to information confidentiality. Cattle rancher's information should be strongly protected from disclosure.

- In addition to confidentiality, cattle ranchers should be shielded from liability for the acts or omissions of others occurring after cattle have left their control.

It is our understanding the USDA-APHIS is considering the implementation of Phase 2 of the ADT program which would include cattle less than 18 months of age. Oklahoma enjoys a rich tradition as a destination for imported feeder cattle. Cattle are brought here to take advantage of this State's abundant forage resources, including native grasses and planted forages such as wheat. These resources make Oklahoma a destination for several million young cattle each year. In light of these unique and valuable resources, the Oklahoma Cattlemen's Association make the following suggestions:

- USDA-APHIS should consider performing a thorough cost-benefit analysis before including feeder cattle into the current ADT program.
- USDA-APHIS should facilitate a separate rule-making process for this group of cattle.
- Nationally, more than 26 million feeder cattle are moved through the United States beef system annually. With this scope in mind, any new rule for including these cattle in an ADT program should consider:
 - o The potential for slowing the speed of commerce, adversely affecting the marketability of many feeder cattle;
 - o How the cost of compliance will be divided among industry participants;
 - o How the increased amount of data brought into the system will be managed and by whom.

Finally, there is much discussion about the use of newer technologies for identification in our industry such as radio frequency ear tags or RFID. As this technology continues to improve, their inclusion into the ADT program could present challenges and will necessitate well-thought out and detailed implementation plans as well as adequate implementation periods.

OCA encourages USDA-APHIS to follow a contemplative and collaborative approach with stakeholders as plans are being discussed to expand the current ADT framework for cattle and bison. All significant gaps in the current ADT system must be identified and the functions of the ADT system strengthened and made more efficient by USDA-APHIS and the States/Tribes prior to the introduction of more than 26 million cattle into the system.

Again, thank you for the opportunity to provide written comments.

Sincerely,



Michael D. Kelsey
Executive Vice President