



April 19, 2023

Dr. Aaron Scott  
Director, National Animal Disease Traceability and  
Veterinary Accreditation Center, Strategy & Policy  
Veterinary Services  
Animal and Plant Health Inspection Service  
United States Department of Agriculture  
2150 Center Avenue, Fort Collins, Colorado 80526

Re: Docket #: APHIS-2021-0020: Use of Electronic Identification Eartags as Official  
Identification in Cattle and Bison

Dear Dr. Aaron Scott:

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to submit the following comments on the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Services (APHIS) proposed rule to amend the animal disease traceability regulations.

NASDA represents the Commissioners, Secretaries, and Directors of the state departments of agriculture in all fifty states and four U.S. territories. State departments of agriculture are responsible for a wide range of programs, including food safety, conservation, and fostering the economic vitality of our rural communities. Combating the spread of animal disease is also among our chief responsibilities. State departments of agriculture regulate and oversee animal health programs in their states to protect against animal disease outbreaks and secure our food supply. NASDA is committed to working with intergovernmental agencies and industry stakeholders to foster a collaborative approach to animal health initiatives.

NASDA supports the funding and resources needed to maintain the robust state and federal animal health infrastructure necessary to facilitate early detection, surveillance, response, and control activities to prevent and mitigate both domestic and foreign animal diseases. NASDA supports increased dedicated funding available to states to facilitate the build-out of critical Animal Disease Traceability (ADT) infrastructure. The threat of a foreign animal disease impacting the United States protein market is real and tangible, recently evidenced by the outbreak of High Pathogenic Avian Influenza and ongoing concern of African Swine Fever. A robust disease traceability system and corresponding action from states and their partners are critical to the United States' response in protecting our food supply, as well as domestic and export markets. While states have taken steps to improve their ability to detect and trace animal diseases, there are still significant gaps in the overall infrastructure. With a production value well over \$100 billion, providing tools and resources to the states to protect the livestock industry is a top priority.



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NASDA has been a long-time advocate of funding and resources needed to maintain a robust state and federal animal health infrastructure. Increased funding would allow further development of animal disease traceability infrastructure at the state-level and enhance the overall US animal disease traceability system. States would be able to utilize the existing Animal Disease Traceability (ADT) Cooperative Agreement program, which is a familiar platform, and have the ability to focus funding requests to meet their individual needs.

The ADT Cooperative agreements establish strong standards to ensure interoperability across all participants and the protection of the data collection and utilization process. While the ADT Cooperative Agreement program is already established, states would be heavily encouraged to look beyond just department needs and engage with key partners within their state, including auction barns, livestock producers, and processing facilities to facilitate their participation.

A strong disease traceability system is an insurance plan for our livestock industry, but also assures American consumers and global trading partners that the US has a safe and sustainable food supply. NASDA appreciates the opportunity to provide these comments and encourages USDA APHIS to support partnerships with State Animal Health Officials and other stakeholders when responding to emerging, transboundary, and foreign disease outbreaks in animals.

If you have questions, please contact Stephanie McBath, Associate Director of Public Policy for NASDA ([Stephanie.McBath@nasda.org](mailto:Stephanie.McBath@nasda.org)).

Sincerely,

A handwritten signature in black ink, appearing to read "Ted A. McKinney". The signature is written over a light gray, textured rectangular background.

Ted McKinney  
Chief Executive Officer