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American Goat Federation Comments
Docket No. APHIS—2007—0127
Scrapie in Sheep and Goats
Proposed Rule
9 CFR Parts 54 and 79

December 4, 2015

We are commenting on behalf of the American Goat Federation (AGF). AGF is the national trade association for the US Goat Industry representing over 90,000 goat producers in the United States. Please note that several of our comments are made in conjunction with and in support of the ASI comments that are being submitted under separate transmission.

AGF appreciates the publication of the proposed rule to amend the scrapie regulations in 9 CFR Parts 54 and 79 as the federation is a strong proponent of Scrapie eradication. The amendments proposed by APHIS have been reviewed and in our opinion, for the most part are an improvement over the existing program.

We offer the following suggestions for consideration and we urge APHIS to implement the amendments quickly once all public comments have been considered.

Sheep and Goat Identification

- We agree with APHIS that it is necessary and appropriate to make the scrapie ID and recordkeeping requirements for goat owners consistent with those of sheep owners. Since scrapie is a disease of sheep and goats and since the U.S. can only be recognized as scrapie-free if the disease is eradicated from both species, we believe this proposed amendment is necessary.
- Traceability of sheep and goats is a key component of scrapie eradication because of the nature of the disease. Finding infected and source animals through tracing backward and tracing forward are heavily dependent upon ID compliance, especially at points of concentration. Livestock markets provide a very important service to the sheep and goat industry in general and are key partners in the scrapie eradication efforts. While APHIS reports an excellent ID compliance rate of about 96%, there are still roughly 20% of adult sheep that are not traceable to source or infected flocks when these sheep are under investigation. AGF also realizes that traceability of goats is problematic because the goat industry lags behind in working with the identification program. AGF believes that measures should be taken now to improve traceability especially on sheep that have scrapie identification devices. We recommend that

APHIS consider streamlining the ID options available to producers through livestock markets (and dealers) in the following ways:

A - Continue to provide markets with “slaughter-only” ear tags for use on any sheep or goats meeting the requirements for needing a tag and for which no owner-tag is provided.

B - Sheep and Goat producers sometimes need a market or dealer to apply ear tags on their animals for various reasons and have been willing to pay a fee to have this done. Therefore we believe it is important for livestock facilities to have the ability to act as agent for the producer. When animals are brought to markets and concentration points in one-owner lots without owner tags being provided, it is logical that markets could apply APHIS-provided serial tags and be able to keep the appropriate owner records for an appropriate cost. However, we believe that producers should be strongly encouraged to have on hand and be able to supply their own official tags to livestock facilities (markets, dealers, etc.) to both aid and simplify traceability rather than making other serial ear tags available to livestock facilities for identifying animals that are not ear tagged, as has been the case, when they are unloaded. Such an incentive for producers to have a scrapie ID and their own tags should also aid ID compliance. When sheep and goats are brought to markets in mixed-owner lots, we recommend that either they are presented with owner tags already applied or if they were not, markets could apply slaughter only tags to these unidentified animals. And we believe that information should be prominently shared with producers which might encourage them to tag their animals.

C - Work with the livestock markets on ways to simplify their current scrapie recordkeeping burden by considering allowing markets to input scrapie ID data and “owner/hauler data into the national scrapie database in a manner that works at the speed of commerce. If this documentation is electronically provided and recorded into the APHIS database, traceability should be enhanced and the current 5-year recordkeeping requirement for markets may not be necessary.

D - Provide templates with required fields marked for owner/hauler statements and for any other required information or data as in the case of entities that acquire or dispose of animals.

- AGF recommends that broad implementation of the ID data submission proposal be postponed until the system(s) be tested through one or more pilot projects so that any appropriate adjustments can be made before national implementation occurs.
- APHIS proposes to add a definition for a “group/lot identification number”. While AGF views this as a potential enhancement for the traceability of groups of animals that are assembled for temporary management purposes, etc. we request additional information on the need and potential use of this category. Also, a movement exemption for grazing and other management purposes is discussed and, as is the case as covered in the current regulation, producers routinely graze their sheep and goats near state boundaries and cross them in remote locations as well as on roadways. However, the explanation in the proposed rule implies that prior notification is required if state boundaries will be crossed. One-time or more often notification when changes are made to original notification would be workable on a practical basis. Real-time notification however would not be practical since migratory flocks, as an example, cross state boundaries often at times and no electronic communications are available in many areas. We urge APHIS to review the exemption, definition and requirements

carefully and make adjustments as necessary so that grazing and routine management is not impeded.

Consistent State Standards

- We believe that it is important that APHIS has clear standards for achieving and maintaining “Consistent State” status and in order for the U.S. to become scrapie-free it will be necessary for all states to become “Consistent”. We agree with APHIS’ proposed amendments (surveillance and data reporting) regarding Consistent State Standards. We also urge APHIS to work with state animal health officials regarding their individual and perhaps unique circumstances or needs as they strive to achieve the standards for the good of their state and the entire industry. We believe that one year is an appropriate time period for states to implement any changes necessary for compliance once notification from APHIS has been made. AGF also recommends that APHIS implement slaughter surveillance at state inspected slaughtering establishments. More and more sheep and goats move through non-traditional market channels and many are processed at smaller, state inspected slaughtering establishments. It is particularly important in the case of goats that surveillance efforts be increased as best possible for animals moving through non-traditional channels and back yard sales.

Genetic Testing

- AGF appreciates and agrees with the proposal to amend the regulations to include genetic testing information in the regulations so that classical scrapie-risk in sheep can be determined and classified. When genetic testing proven through research and technology was commercialized, the sheep industry invested heavily through selection and culling in order to help rid scrapie from their flocks aside from regulatory requirements. This tool has greatly helped the sheep industry achieve the low scrapie prevalence level it has today. We recommend that APHIS encourage the Agriculture Research Service to continue to research genetic resistance and susceptibility in goats. It was not until a reliable genetic test became available in sheep that producers began to take real steps to control the disease by selective breeding and culling. Without the same genetic testing available to goat producers, compliance will lag. The potential use of genetic testing for scrapie risk in goats would expedite the overall scrapie eradication process and be beneficial to both the sheep and goat producers, and the agencies faced with the responsibility for tracking and controlling the disease.
- While atypical or Nor98-like scrapie is classified into a different and less threatening disease category, AGF believes that it is important that this disease be tracked when it is found in case research or field experience demonstrates that this disease deserves further regulatory action. We recommend that flock mates and offspring of Nor98-like scrapie cases be permanently identified for a period of not less than five years after such a case is found in a flock and that compliance of this recommended requirement be verified by APHIS and state officials annually.
- AGF agrees with APHIS on the changes to the definitions as proposed.

Resources and Funding

- The scrapie eradication program has been very successful thus far even though funding has been meager especially in recent years. Hopefully the program will soon be

moving into a stage where there will be a need to look harder for the disease therefore additional resources will be needed for surveillance, enforcement of compliance, education, etc. We recommend that APHIS give serious consideration to expanding the surveillance effort to include a broader target of sheep and goat types and, of course, significantly enhance surveillance of goats.

- In order to finish the job of eradicating scrapie from the U.S. in the most expeditious manner possible we urge USDA to increase the funding request for the scrapie eradication component of the small ruminant portion of the Equine, Cervid and Small Ruminant Health line to more appropriately reflect the expanded needs of the eradication program as it enters its final stages. AGF strongly recommends additional funding be provided specifically for goat related eradication efforts including educational activities, increased surveillance and targeted efforts related to non-traditional marketing channels.

Flock and Animal Designation Categories

- AGF agrees with the definition and category modifications that APHIS is proposing.

Updating Other Definitions in Parts 54 and 79

- AGF agrees with the proposed updated and new definitions that are included in this section.

Indemnity Provisions

- AGF believes that the modifications proposed by APHIS are generally appropriate. We believe it is proper that a late-stage pregnant animal, no matter her age, be indemnified at a higher level than an open one.

Program Standards Comments

Part II under Indemnity Premiums

- With regards to section J. 4. d), see above under Indemnity Provisions. We believe that it is appropriate to pay a higher indemnity for a pregnant doe or a doe with a kid at their side of any age.

Part III under Official Ear Tag Placement

- 3. 2) Ear tag placement a) states “Ear tags should be placed in the left ear to aid in shearing”. AGF agrees that left ear placement of tags is appropriate both to aid the shearing process but having official tags placed in the same ear provides an element of program uniformity so people who need to look at animals to quickly determine if they have a tag and/or read the numbers will know where to look. AGF urges APHIS to expand this section and recommends the following additional point:
 - Ear tags should be placed towards the outside edge of the ear approximately half way between the base and the tip.
 - Specific needs for specific goat breeds need to be addressed (i.e. lamanchas) as far as tagging requirements are concerned.

Metal ear tags are especially hazardous to shearers if the tags are struck by the shearing hand piece. This can cause serious injuries to the shearer and the sheep and often leads to the disfiguration or loss of the official tag. AGF strongly recommends

that APHIS communicate these hazards to their state partners and producers and encourage them to follow these proposed amended tag placement guidelines and to consider using only plastic ear tags on goats as metal tags often cause infection in goats ears.

Parts VII and VIII

- AGF believes that these sections do a good job of explaining the various flock actions that can be or are to be taken under the scrapie eradication regulations. It is important that this information be written clearly, as is the case. We also believe it is important for officials to explain all of the practical implications on each step of the actions to be taken to sheep and goat producers. Our nation's flocks are owned and operated by farm and ranch families with many different individual circumstances. Thus, flock actions taken or those that are being planned will have various effects on their operations and also their family members. In addition, the nation's goats are owned and operated by a vastly divergent population, many without farming or ranch backgrounds, making it even more challenging. We urge APHIS to communicate this to the personnel and provide some guidance or training on working with flock owners through potentially adverse circumstances such as weather, limited feed supplies, youth project animals, family health, etc. when official actions are to be taken.

Again, AGF appreciates the publication of the proposed rule to amend the regulations in 9 CFR Parts 54 and 79 and we urge APHIS to implement amendments once public comments have been analyzed and carefully considered. AGF understands the particular need to reach goat producers and pledges to work with APHIS and their state partners to help provide information to producers and allied industry on changes in the interest of moving the program forward and finally eradicating scrapie from the U.S.

Sincerely,



Tom Boyer
AGF President