

This report is made available for information only, and does not represent official USDA policy or guidance. Submitted to the NAIS Subcommittee of the Secretary's Advisory Committee of Foreign Animal and Poultry Diseases for review, this report contains recommendations from the Goat Species Working Group regarding the NAIS.

National Animal Identification System Goat Species Working Group Report September 2006

The Goat Working Group is comprised of volunteers representing the major sectors within the U.S. goat industry and is charged by USDA with developing a viable plan for permanent identification for goats and addressing other species-specific components related to the NAIS. USDA requested direction as to how NAIS could achieve its goals with the opportunity for the Working Group to offer suggestions on benchmarks that would provide incremental progress towards the ultimate 48-hour traceback objective. With this challenge, the Goat Working Group has developed the following comments and recommendations. This document is a work in progress, and additional comments will be provided in a future report. The committee is continuing to work on a number of issues and clarifications.

BACKGROUND

While some species do not have uniform identification methods in place, official identification of most breeding goats is currently required under the USDA, National Scrapie Eradication Program (NSEP). We believe the basic ID components of this existing program should be utilized as a framework for at least an interim NAIS ID program for goats. Efforts to achieve full industry compliance with the Scrapie Program have led to a greater understanding by producers of the methods used and the infrastructure needed for animal identification, disease surveillance and traceback. This background experience will be valuable as a transition to the implementation of a plan that more completely and uniformly addresses the goals and methods outlined in the NAIS documents.

Initially, a combined Sheep and Goat Working Group was established. The inherent differences between sheep and goats (as well as other species) require different needs for identification, so the two groups split into individual working groups, but continue to share information and considerations with the chairs and several other working group members on both committees. This also allows for more diverse representation from each industry. The Sheep Working Group has an excellent overview of the NSEP, and we have not duplicated that material here.

The goat, as a small ruminant species, shares several similarities with the sheep. However, the differences between these animals include, but are not limited to, eating habits (sheep graze and goats browse, thus tag retention is a serious concern); animal interaction with fencing of various types; ear thickness, texture, and range of ear types; and the broad uses of goats in general. Goats are utilized for a range of operations, including: dairy, meat, fiber, companion, packing/hiking, brush control (weed abatement and fire control), and biotechnology. Also, the large number of goats in very small herds and the lower value per animal, when compared to other species, contribute to an economy of scale issue that would create financial burdens if producers were required to use only electronic devices.

Additionally, age and source verification does not add value for global trade in the goat industry. This is primarily because the U.S. does not export any significant amount of Chevon (goat meat) and thus, in contrast with the beef industry, it has no financial incentive for goat producers.

The number of digits to be placed on tags is also a challenge for both sheep and goats since the tag would need to be small and lightweight, and yet to include 15 digits will make the numbers very small and possibly not legible during many handling applications, such as movement through market sales. Therefore, it will be a challenge to establish a single method of tag identification that can be effective in all applications while meeting the 15 digit standard for NAIS.

Premises ID

Goat owners currently are already assigned premises ID numbers with the mandatory NSEP (Scrapie) program, although the definition of a NSEP premise is not consistent with the NAIS premise definition. Some states have decided to automatically assign a NAIS Premises ID number to all individuals with an assigned NSEP premises number. Some producers have received this negatively, and we believe it has contributed to less participation in NAIS. Since the definition of "Premises" varies between the NAIS and the NSEP programs, these discrepancies will need to be addressed and explained to producers. If the Scrapie program premises number is linked in the database with the new NAIS premises number, this should facilitate the transition.

While understanding that this is a state-by-state decision, it is our recommendation that producers be contacted regarding obtaining the new NAIS number rather than having an automatic assignment. We feel the assignment of a Premise ID should be only at the express consent or by request from the premises owner. We ask that USDA provide this recommendation to the individual states.

Identification Methods/Devices

Goat breeders currently utilize a range of individual ID methods for management and/or registry purposes. Each has specific advantages and disadvantages.

Currently, approved metal ear tags, plastic ear tags, RFID tags, electronic implants and tattoos are all accepted methods of identification for the Scrapie (NSEP) program. We recommend these options continue to be available for goat breeders to utilize for the NAIS program. Rumen boluses are a possible ID method which is currently being tested. Freeze branding is being used on some goats in the brand state areas.

Ear tags, in general, have been found to be significantly unreliable, as retention is a major issue reported by breeders. Infection at the site of tag placement has also been often reported. Application methods seem to significantly contribute to retention, and this needs to be addressed with education for producers. Research with RFID devices for goats is underway in other countries, however only limited research is being conducted in the US. The technology is widely promoted and may prove to be acceptable as ID programs move forward, but there has been insufficient testing in goats in a variety of managements as of this date. Completion of objective trials of RFID devices and readers for goats must address the wide range of managements and marketing systems in the U.S. as well as the variety of breeds of goats, which have a range of coats as well as ear types. We acknowledge that the move to a more uniform ID program is desirable for efficiency, however the flexibility of options that can be utilized to accommodate the

uniqueness of goats and the range of uses and managements needs to be in place. For example, the LaMancha breed of dairy goats has a very small ear that makes it extremely difficult to utilize ear tags effectively. Currently, caudal (tail) tattoos are used for ID purposes in this breed (ear tattoos are used in other dairy breeds, and some meat breeds as well).

When one considers the necessity of shearing fiber goats such as the Angora and Cashmere breeds, fiber removal in the head and neck region increases the possibility of shearers accidentally cutting off ear tags. A combination of design change; additional ID options, as well as educational efforts aimed at reducing this potential problem will be critical to a successful ID program for goats.

Electronic implants (EIDs) are being used in increasing numbers by goat breeders, and are accepted by several goat registries. Breeders typically use caudal (tail), auricular (ear) and dorsal thoracic (withers) locations for implants. The advantages include ease of application, retention, and less "cosmetic" damage to the animal, particularly those with show breeding stock. The disadvantages include cost; lack of consistency among manufacturers (thus requiring different readers); no visual ID component; and lack of a USDA/FSIS approved site for the implantation. EIDs are favored by many goat owners, but since there is no USDA approved site for electronic implants in goats, this area needs attention to address possible food safety concerns. The auricular (ear) implant site is approved for sheep. We recommend the caudal area (distal portion of tail – so as not to interfere with tattoo placements) for electronic implants, when used in goats.

We acknowledge the need for visual and electronically readable forms of ID as a longer-range goal. Electronic tags would facilitate accuracy and speed of reading and recording information in commercial settings, but there hasn't been sufficient testing to recommend at this time. This, coupled with the expense per animal in proportion to the value of the animal, means that this should not be the sole method of ID in goats at this time. In a disease outbreak, it would be also be desirable to be able to identify necropsied animals if readers aren't readily available.

We recommend that goat breeders have the option to use all methods of ID currently approved for the NSEP program. This includes these optional forms of identification: any official scrapie tag; or tattoos (legible individual registry tattoos issued by breed associations may also be used as official identification when the animal is accompanied by its registration certificate listing the tattoo); or electronic ID (if the goat breed registry recognizes electronic microchips or RFID tags as an authorized form of ID and the number is recorded on the registration certificate, then electronic ID is acceptable). Owner must also have registration or identity certificate (or a copy of it) or a Certificate of Veterinary Inspection which includes the microchip number that matches the one on the registration/identification certificate. We recommend the caudal area (distal portion of tail – so as not to interfere with tattoo placements) be used for electronic implants. This addresses the need for a consistent implant location and also addresses food safety concerns. All tails could then be condemned at slaughter.

Further, an animal record should contain all reported identification methods for that animal, and the fields of information should be linked so that an animal can be easily located based on any identification reported.

We recommend that USDA Cooperative Agreements be made available for specific research for goat identification addressing a variety of breeds and management methods, as well as market place environments. Further, the results of any research should be made available to the Goat Working Group for further consideration.

We recommend that RFID reader and scanner manufacturers and suppliers be encouraged to provide readers and scanners that can read ISO/ANSI 11784/11785 livestock microchips, and read or at least detect all 125 kHz frequency companion animal microchips. We recommend that currently used microchips be accepted for a period of time to be determined as appropriate.

Implementation Time Table

Until electronic identification (RFID or other method) has been fully tested under the range of managements and environments; other methods of identification currently accepted with the Scrapie program should continue to be acceptable for goat ID. As those trials are completed and design changes identified, the transition to a uniform method consistent with NAIS protocol could then move forward. Sufficient funds to conduct this research and funds to assist producers in the purchase of the devices should be made available before the consideration of any required electronic identification program for goats.

Additionally, many believe that the NAIS program should be more developed (with ongoing opportunities for feedback) before any steps are taken to have any portions of the program become mandatory. People are being asked to sign up for a premises ID without knowing full details and implications of what might actually be implemented later. Full disclosure of the program and plan should be available before making any transition from voluntary to mandatory components.

While we understand the value of having total participation in NAIS, we recommend that a voluntary program continue until more consideration can be given to questions raised by many. The most value in the program will be realized if producers are provided the opportunity to continue to offer input and help in identifying potential areas for change and improvement.

We recommend continuation of the current cost-sharing approach as used for the Scrapie program, as the program develops.

Group Lot Identification

Management systems that keep groups of goats together from birth to slaughter should have the option of using a Group Lot ID system, when such ID might be necessary. This arrangement is common particularly in raising kids for the holiday markets that go directly to slaughter. Another example would be the pasture-to-pasture movement for herds used in forest management and weed abatement programs. In cases such as these, each group lot would have a unique identification number that would include the premises number, date assembled and two additional digits. Using the option when practical would be a cost savings for breeders.

Individual animals leaving the group would be required to have individual identification, if triggered by a required event for ID.

We recommend the optional use of a group lot identification program, when applicable, for goats.

Movement Reporting

Significant numbers and a wide variety of movements occur within goat breeding operations. These can range from travel to the office of a veterinarian or a trip to a local school to a large exhibition involving hundreds of animals being commingled. Requiring movement reporting of all movements would be overwhelming to the goat industry in general, and would not be practical to implement. Since the methods of reporting and even the location of storage of movement information are still undetermined, at this stage it seems reasonable to concentrate only on those movements which would be at highest risk for disease transmission and those movements which are currently already being documented through existing regulatory reporting. This would include a Certificate of Veterinary Inspection or any other inspection or permit process required in moving goats.

We acknowledge that identification information contained in a Certificate of Veterinary Inspection does not actually indicate that an animal moved. In the event of a disease outbreak, however, it would provide information for contacting the premises representative to determine which animals may have actually been moved. The information in the CVI is maintained by the involved states, and would have the necessary information as to the point of origin and destination. By using this existing system, it would not create any undue burden on the owner to provide this information to a separate reporting repository.

Since the National Scrapie Eradication Program (NSEP) has specific requirements for identification of sheep and goats, those requirements would also help to meet the needs of tracking movements during a disease outbreak. However, goats in categories/classes not included in the NSEP program would not be exempted in the NAIS program.

We encourage individual animal movement recording efforts for our producers. The development of a uniform easy-to-use form would be helpful for producers to document their specific movements. This information could then be provided in the event of a disease outbreak. This form could be available as a downloadable document from the web, and through other distribution areas. It could also be the basis for an optional online movement reporting process.

We recommend utilization of existing methods of collecting and reporting movement information such as the Certificate of Veterinary Inspections or when required for current regulatory programs. Only these movements would be reported until further assessment of NAIS program logistics can be conducted, and additional comment then offered by species working groups. Any mandatory reporting would be done by the receiving premise, but ideally the owner should have an option to report movement on a voluntary basis.

We encourage goat registries to begin consideration of mechanisms to document movement of goats at events such as sponsored shows, to assist with providing this information in the event of a critical disease outbreak.

We encourage goat producers to keep records of movements of their animals.

Work To Date

In an effort to provide information regarding the work of our group and NAIS in general, we have developed a website (USAnimalID.com). We have received a large number of comments from goat breeders over the past three years. There has been objection to the program in general and many comments strongly oppose the program. Additionally, concerns have been raised over confidentiality of producer records; practicality of the implementation process has been questioned; concerns raised about program cost; lack of details about mechanisms and cost of reporting movements; concerns about privately held databases, and general objections to any

requirement of providing information to a government entity. With regard to those who have commented to provide opinions on the type of ID to be accepted for NAIS, there has been almost unanimous agreement that there needs to be flexibility to allow the currently used ID methods already accepted in the Scrapie (NSEP) program.

Successful Implementation

1. The implementation of a successful National Animal Identification System program should address and include the following components:
2. A gradual transition to any new identification protocol by using the existing Scrapie program-approved ID methods. Continued flexibility of ID methods/devices should be allowed and exploration of new technology as it becomes available.
3. Evaluate a system that would allow existing ID methods to be incorporated into a uniform National ID System. For example, the unique tattoo or electronic implant requirement of a dairy goat registry could be tied to a registration number that conforms to NAIS standards.
4. Adequate research and field trials using a range of goat breeds and management environments.
5. Cost-sharing approach for all involved parties.
6. Recognition that the cost of ID devices/methods for goats can be significant when compared to market value per head, and should not hinder the economic viability of the industry. There is a large number of goats in small herds, and it is important to protect small farm operations from unnecessary burden and cost, while identifying ways to achieve disease surveillance to protect animal agriculture in general.
7. Involvement of industry (including producers, registries, organizations, markets, veterinarians and others) as the planning process continues, to assure a realistically designed plan and to help ensure industry acceptance and participation.
8. Continued cooperative efforts between the sheep and goat industries that will identify similarities between the plans for each species, while also recognizing the differences that require alternative considerations for each specie.
9. Systems that can be incorporated with existing production/management information would encourage more producer participation.
10. Reasonable record keeping that combines with data electronically obtained and submitted. Protecting of confidentiality of producer information is a priority among producers. Any records requirement should not exceed current program requirements (for example, Scrapie program requires 5 years).
11. A comprehensive educational effort that can offer information and accurate answers for producers, markets, consumers and veterinarians. Training and outreach programs should be available for veterinarians, producers, inspectors, truckers and markets. They need to learn how to recognize signs of foreign animal diseases and to know what follow-up steps would be taken in such a disease outbreak, and more specifics about what the NAIS involves.
12. We believe it is important for individual states to also consider the recommendations of the species working groups should states separately implement programs prior to full implementation of NAIS on a national basis. Further, if there is not uniformity among states, there will continue to be confusion and frustration about animal identification in general.
13. Adequate funding to provide adequate staffing to handle existing regulatory programs and port inspections should be ensured. Federal incentive programs for encouraging new veterinarians would help ensure qualified employees are available.

We also recommend ongoing communication with our trading partners in North America while also communicating with other global partners to address animal identification in general.

We also appreciate the clarifications offered in the NAIS Guide for Small-Scale or Non-Commercial Producers, which includes the following (in part):

The focus of NAIS is animal health, primarily within the commercial animal production sector in which animals move from their birthplace to a subsequent location(s) over the animal's life cycle. USDA's NAIS efforts will largely focus on commercial operations and animals at such locations due to their higher risk of spreading diseases among multiple locations and for greater distances.

Animal identification and tracking:

- If animals never leave the farm of birth or are only moved for custom slaughter for personal consumption, owners will not be asked to identify them or report their movement.
- Animal owners who choose to participate in the animal identification and tracking components of the NAIS, are not expected to report all animal movements.
- Reportable movements are those that involve a high risk of spreading disease, such as moving livestock from a farm to an event where a large numbers of animals are brought together from many sources.
- USDA will only request animal identification data to respond to an animal disease outbreak or other emerging animal health concern.
- USDA fully recognizes that NAIS must be practical and affordable for all sectors of agriculture.

The primary purpose of the NAIS is to enable rapid animal tracing and disease containment in the case of an animal disease outbreak or other emerging animal health concern among U.S. livestock and poultry. USDA will only request data and combine information from the databases when animal health officials need information to respond to such a disease outbreak or emerging animal health concern.

Definition of Non-Commercial Producer

Under the NAIS, the following criteria describe non-commercial producers:

1. Individuals whose animals are not moved to auction barns or from their location to those of commercial producers.
2. Individuals whose animal movements are limited to those moved directly to custom slaughter; movement within a single producer's premises; local fairs and local 4-H (and/or other youth organization events).

{ **Note:** The GWG believes there needs to be further clarification with regard to non-commercial producer definitions and determinations as well as fairs and other exhibitions }.

Guidance for Non-Commercial Animal Identification and Reporting Animal Movements:

Scenarios that would not call for animals to be identified and/or movements reported in the NAIS include:

- animals that never leave the farm/location of birth;
- animals moved from their birth premises directly to custom slaughter for personal use of the animal's owner;
- livestock moved from pasture-to-pasture within one's operation;
- participation in local fairs and parades;
- the local trading of birds among private individuals; and
- animals that "get out" and cross over into the neighbor's land.

Also, animals used for recreational purposes do not need to be identified if they are permanently cared for at their birth premises. Comprehensive recommendations for identifying animals and reporting movements are in development in cooperation with the species-specific working groups and State-Federal animal health authorities.

The Goat Working Group appreciates the opportunity to contribute to the discussion by operating as a separate Species Working Group. We encourage solicitation of continued input via this

committee as well as representation on an Oversight Committee or other body as may be established. We ask for continued opportunity to provide additional comment and recommendations as the program evolves.

Activity	Goats
Registration of Premises	Owner of Premises
Responsible party for the identification of the animals.	Owner of animals at current premises (lessee of a leased animal).
When is the animal to be officially identified?	When an event triggers the need for Official ID such as: 1) when Certificates of Veterinary Inspection or permits are required for movements. 2) when required by another regulatory program, such as the National Scrapie Eradication Program.
What animals must be identified?	All classes of goats, when moved from the birth premises under the event triggers as identified herein.
Events that "trigger" the requirement of official identification?	1) When Certificates of Veterinary Inspection or permits are required for movements. 2) When required by another program, such as the National Scrapie Eradication Program.
ID Method to be used	All methods currently accepted for the National Scrapie Eradication Program.
Report of Movements who is responsible?	Person responsible for the animals at the receiving premises.
Who reports Interstate Movement?	Accredited Veterinarian when Interstate Certificate of Veterinary Inspection is required. Receiving premises uses e-permits when no health certificate is required.
Time frame requirements for reporting movements	As required for any existing regulatory programs.

NAIS Goat Working Group Members:

Linda S. Campbell, Chair Producer – Dairy/Meat/Fiber Luray VA	Stan Potratz Producer/Premier Supplies Washington IA
Barry Arnett Producer Williamsburg, KY	Jeff Ramseyer Producer Ohio
Jan Carlson UC Davis Goat Teaching & Research Facility Davis, CA	Joe David Ross, DVM Producer Sonora TX
Charley Christensen Producers Livestock Auction Co. San Angelo, Texas	Joan Dean Rowe, DVM Producer Department of Population Health & Reproduction School of Veterinary Medicine Davis, CA
Bennie Cox Producers Livestock Auction Co. San Angelo, Texas	Lisa Shepard Producer Performance Programs Coordinator, ADGA Atascadero CA
Bonnie Chandler Producer American Goat Society Representative Harvard MA	Marvin F. Shurley Producer President, American Meat Goat Association Sonora TX
Carolyn Eddy Packgoat Producer Estacada Or	Robert Swize American Boer Goat Association San Angelo TX
Rene DeLeeuw Producer White Plains NY	Cindy Wolf, DVM Chair, Sheep Working Group Producer/University of Minnesota Rushford MN
Ray Hoyt Producer/National Pygmy Goat Association Minden, Nevada	Linda Worley Producer Wayne OK
ADVISORS:	
Diane L. Sutton National Scrapie Program Coordinator USDA, APHIS, VS Riverdale, MD	David L. Morris, DVM, PhD USDA/APHIS/VS/NCAHP/SIP/NAIS Fort Collins, CO