

December 31, 2018

Mr. Kevin Shea
Administrator
Animal and Plant Health Inspection Services
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Mr. Shea:

The American Sheep Industry, the American Goat Federation and the American Dairy Goat Association are grateful to you and your staff for taking the time to meet with us during the U.S. Animal Health Association annual meeting to discuss scrapie tags and the future of the scrapie eradication program APHIS oversees. Scrapie eradication is a key priority for the American sheep and goat industries.

None of us wants to jeopardize the very successful \$260 million scrapie eradication program that has been carried out for nearly 20 years, especially when it is so near to achieving our goal of complete eradication. We believe that an important key to the success of this program has been the USDA's provision of no-cost tags, particularly plastic tags, with flock identification numbers. These tags were the initial incentive that brought producers into the program and helped them establish viable flock traceability programs on their premises. As you are quite aware, a successful traceability program is vital not only to the eradication of scrapie but for any future animal disease emergencies that may occur.

Unfortunately, just as we are set to expand the eradication program to include goats and other potential pockets of infection, these no-cost tag options have been discontinued due to budget matters. We are very concerned that this action will be detrimental to the successful scrapie eradication program by bringing it to a halt before we can reach our goal of eradicating scrapie from the U.S. This is why we have asked to work with you to find a way to restore these options in a cost-effective manner.

We recognize the financial constraints that APHIS is working under and we know that, like us, the Agency would like to find a path forward. In our opinion, it is vital that an incentive program of some kind be retained to encourage new flock owners and goat producers to participate in the program. We ask APHIS to commit \$300,000 to plastic tags with flock ID numbers (more if the 2019 appropriations include additional funding) and in return, the industry will accept that these free tags will be restricted to first time flock ID requests and to goat producers in order to bring them into the program. New flock ID requestors would be allowed to receive a limited number of tags (we discussed no more than 80 tags during the meeting). Goat producers coming into the program could also get a limited number of tags each year until they have established their traceability programs. The producer would assume the cost of the taggers, which for small flocks would be roughly 50% of the total cost of tagging. Because of the importance of animal identification at markets, we believe an inventory of no-cost tags would

need to be supplied to markets and we recommend a small run of metal tags and plastic tags be produced for that purpose.

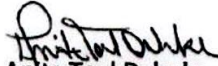
Animal traceability is vital to the success of the scrapie program. We are aware that APHIS is moving toward an all-electronic animal identification system. At this time our industry does not uniformly utilize electronic ID and we do not have an effective electronic ID system for our industries. At the October 23 meeting we committed to exploring such a system so that we may comply with USDA's future plans. In the meantime, we believe that the use of plastic tags is the best way to secure continued industry buy-in to animal traceability. While it is true that plastic tags cost more, and in an era of restricted budgets can be an easy target for funding cuts, we believe they can be readily defended because they are better for the welfare of the animal (they do not result in infection the way metal tags do) and are significantly better for the safety of those who work with the animals, such as shearers and tag readers, because they are easier to see and locate. We urge APHIS to continue with no-cost plastic tags for the time being and we commit our industry to exploring a practical electronic identification method for sheep and goats.

We believe that the points above reflect the discussions held on October 23 with you and your staff. If we have missed something or your understanding is different, please let us know. We look forward to working with you and your staff toward a viable solution and continued success in the eradication of scrapie.

Sincerely,



Peter Orwick
Executive Director
American Sheep Industry



Anita Teel Dahnke
Executive Director
American Goat Federation



Shirley McKenzie
Association Manager
American Dairy Goat Association