



August 2002

Federal Bovine TB Regulations Under Review

Public comment period

The USDA is soliciting comments on the current regulatory provisions of the domestic bovine tuberculosis eradication program until September 5, 2002. See **Rules on TB Status** on the opposite page for information on how to make your comments known.

Current Status

California has one dairy herd affected with bovine TB. More than 42,000 cattle in California have been tested for exposure to TB since this investigation began. To date, there is no evidence to suggest that infection has spread from this herd.

Cumulative Since May 13, 2002	
Herds tested	27
Herds retested	1
Number of herds positive and quarantined	1
Animals tested	42,330
Initial TB skin test responders	1151
Reactors	110
Suspects	86
Reactors & suspects eliminated	189
Traceouts eliminated	190
Exposed animals eliminated from quarantined herd	447
Average field personnel assigned on a daily basis	21

Background

In May 2002, bovine TB was confirmed in a Tulare County dairy herd. The CDFA, USDA and the industry established a task force and worked together with the herd owner and his veterinarian to control and eradicate the disease from the herd. The work is ongoing.

The California Department of Health Services and Tulare County Health Department representatives addressed public health issues and coordinated TB testing for the dairy's employees.

What is California Doing to Eradicate the Disease?

- The affected herd is under state quarantine. The cattle are tested for TB at two-month intervals and those testing positive are removed from the herd
- Cattle are only allowed to leave the affected herd to be slaughtered at a USDA inspected facility where enhanced inspection is conducted to ensure they are not infected with TB
- All cattle sold from or associated with the affected herd over the last five years are being traced and tested
- Efforts to purchase and slaughter all cattle that left the affected herd are underway
- Calves from the affected herd are raised away from the adult cattle and are fed only pasteurized products
- Areas on the affected premises that may be contaminated with TB bacteria are cleaned and disinfected

As a precaution and to protect other states, all dairy breeding animals leaving California that are more than six months of age require a negative TB test within 30 days of movement.

At this time, this requirement does not apply to beef cattle.

Potential Impact for California's TB-free status

California's bovine TB-free status has not changed at this time. There are various status levels that can be assigned to a state under the USDA tuberculosis eradication program: accredited free, modified accredited advanced, modified accredited, accreditation preparatory or non-accredited.

For California to maintain its accredited-free TB status, the USDA currently requires that the affected herd be depopulated and that CDFA complete a

full review showing that there is no evidence of TB spread in California. **This rule is under review. See *Rules on TB Status Under Review* below for more details.**

If the state is unable to satisfy these requirements, California's status could be changed to a Modified Accredited Advanced status which would require all California breeding cattle to have official identification and a negative TB test within 60 days of interstate movement OR originate from a TB accredited-free herd (mandatory annual TB testing) OR move directly to slaughter.

If the USDA recommends a change in California's status, it may occur later this year or early next year.

Rules on TB Status Under Review

The USDA is currently reviewing federal regulations that are used to determine a state's TB status when TB is detected.

For CA to maintain its accredited-free TB status after it detects one herd with TB, current federal regulations require the state to conduct a full investigation, demonstrate that there is no evidence of TB spread in the state and to depopulate (slaughter) the entire herd.

On behalf of the CDFA, State Veterinarian, Richard E. Breitmeyer, submitted comments and recommendations to the USDA. An excerpt of those comments follows:

"We believe that the current rule, which bases this downgrade on an absolute number of affected herds without considering the actions that the state and livestock industries have taken to mitigate disease spread, is not scientifically valid. Depopulating herds without mitigating disease risk is inadequate, as recently demonstrated in Michigan where two previously depopulated and restocked herds were found re-infected with TB.

The goal of the National Tuberculosis Program is to prevent the spread of bovine TB. Therefore, the criteria for evaluating the state's status must evaluate the risk of disease transmission, and this is not simply equal to the absolute number of affected herds. A state containing a herd properly quarantined creates no greater risk of TB transmission than a state from which a similar herd was depopulated. The thoroughness of the disease investigation and the control measures instituted are of far greater importance than the absolute

presence of one affected herd. Additionally, the logistics of depopulating and subsequent restocking such a large dairy herd must be considered.

Additional Costs to Cattle Industry

If the USDA reclassifies California's TB status, there will be a substantial impact on the livestock economy, which could last from five to ten years. A Modified Accredited Advanced status would mean that all breeding cattle would need a TB test to leave the state, all feeder heifers and steers be officially identified and that feeder heifers would need to move to approved feedlots if they were not TB tested. Cattle moving from Accredited Free Herds and cattle moving to slaughter would be exempt from the TB test requirement. The estimated cost of TB testing cattle in California is between \$7.50 and \$10.00 per animal.

Feeder beef cattle, including Holstein steers and baby bulls, would require official identification to move interstate. Official registered brands, widely used in California, are an approved form of premises identification on this class of cattle. Because California has a brucellosis vaccination mandate, most beef heifers currently bear official individual identification.

CDFA Recommendations

We recommend that USDA consider amending the current domestic TB rule (9CFR 77.7) to base downgrades of TB State status on the prevalence of TB and the risk of TB transmission. When a state has been Accredited Free for TB and subsequently detects a herd affected with TB, the case must be fully investigated and the risk of spreading infection must be mitigated. Mitigation may not require depopulation of the affected herd. We request that the rule be amended to include an evaluation of the state's response to TB and the disease control measures instituted by the state and the livestock industry before downgrading the state status. We request that recognized experts in the epidemiology of TB evaluate a state's response and determine the classification based on disease risk. Reviews must include the origin of the TB case, the type and location of the livestock operation, other exposed livestock, type of business activities, movement of animals, wildlife interactions, and assess the mitigation measures used to reduce the risk of disease spread from the herd."

How to Submit Comments to USDA

The USDA will accept comments through September 5, 2002. Cattle producers may submit written comments on the regulations to: Docket No. 02-021-1, Regulatory analysis and Development, PPD, APHIS, Station 3C71, 4700 River road Unit118, Riverdale, MD 20737-1238. Please state that your comment refers to Docket No. 02-021-1 or email comments to regulations@aphis.usda.gov



*William (Bill) J. Lyons, Jr., Secretary
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Veterinarian*

CDFA Animal Health Branch Offices

Sacramento (HQ)	916-654-1447
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Ontario 947-4462	909-
Redding 225-2140	530-
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www.cdfa.ca.gov

CDFA Milk and Dairy Foods Control Offices

Stockton	209-466-7186
Oakland 622-4810	510-
Fresno	559-445-5506
Ontario 923-9929	909-

**United States Department of Agriculture
916-857-6170 or 877-741-3690**

Enhancing Communication with Producers

The *Cattle Producer Update* is designed to offer current information for producers about California's on-going bovine TB investigation. For more comprehensive information, contact the CDFA Headquarters Office at (916) 654-1447, a CDFA field office or check our web page at www.cdfa.ca.gov.