Overview of the USDA Online Procedures for Requesting Derogations for Somatic Cell and Standard Plate Count Using the Electronic Trade Document Exchange System (eTDE) and Electronic Document Creation System (eDocs)

To request Derogations for farms whose production is used in the Turkey Export Certification program and whose milk exceeds the Turkey requirements for Somatic Cell Count and Standard Plate Counts, milk suppliers must register to use the Electronic Trade Document Exchange System (eTDE).

eTDE provides a secure environment for sharing trade documentation with governments and businesses across the supply chain.

To work within this security framework, there are several actions that new users and companies must take:

- Individuals must obtain level 2 eAuthentication
- Companies must be registered in eTDE
- First time users must go to eTDE - www.eTDE.usda.gov and will be directed to a profile page to request party and role association.

1. If your company is already registered on eTDE go to https://www.eauth.usda.gov/eauth/b/usda/registration?targetUrl=https%3A%2F%2Fwww.eauth.usda.gov%2Feauth%2Fusda%2Flogin and register for eAuthentication account as a Customer. Here is where you will request Level 2 access. You will receive an email informing you of access or denial of Level 2 access.
   a. If you have been denied Level 2 access, please follow the information provided for obtaining Level 2 status.
   b. If you have been granted Level 2 access, continue to www.etde.usda.gov/etde/ and log in using the same credentials you created for eAuthentication.
1. Select Create an Account

2. Select Create an Account
2. Once you have logged in using the same credentials, you will be brought to another screen where you will fill out your entity (business) information.
   a. Fill out the eTDE User Registration Request.
      i. If you would like to be the Entity Administrator, select “Register New Entity and Become Entity Administrator”
      ii. This option assigns you as the administrator for your business’ account. You will also be the point of contact for approving new users for your business’ account.
      iii. If you would like to be a User for your business account, select “Entity Information Same as Work Information”.
3. Review all information and select Request Registration. This will submit your registration request for ETDE.
4. You will be taken to a new screen that will show your profile information that is for your reference.

   • If you are a new Entity Administrator, please email DairyExportsQuestions@usda.gov, and provide your first/last name and entity name. In addition to your credentials, please state that you are requesting approval for ETDE access.
   • If you are a new User, you will need to contact your Entity Administrator for access.
      o Tell your Entity Administrator to go to www.etde.usda.gov and “Manage User Access” and follow prompts to approving the requested user.
   • If you are a new User and you do not know who your Entity Administrator is, please email DairyExportsQuestions@usda.gov, and provide your first/last name and entity name. In addition to your credentials, please state that your Entity Administrator is unknown.

Once you are approved as a user and/or Entity Administrator, please proceed to EDOCS to access EDOCS. Here is where you will apply for SPC and SCC Derogations.
4. Select ‘Login to eDocs’. Enter User ID and Password

The first screen shows two tabs: ‘In Progress’ and ‘Submitted’ – these queues show you what certificates you have submitted and which ones you are still working on ‘in progress’.
5. Select Derogation Request in the grey bar.

The first screen shows two tabs: In Progress and Submitted – these queues show you what certificates or derogations you have submitted and which ones you are still working on ‘in progress’. There is a “Create Derogation Request” link in the top right-hand corner of the page. Select this to begin a new request.
This is the screen view when you select “Create Derogation Request”:

Choose the appropriate template for the type of notification or derogation you need.

- **Notification** - Notify USDA the first month the rolling mean goes over 400,000 for SCC or 100,000 for SPC
- **Derogation** – Annual derogation when a farm has been out of compliance for three consecutive months after a notification has been submitted
- **Seasonal Derogation** – When a farm is in compliance 9 months of the year, has satisfactory production methods but is still not able to meet the requirements during certain seasonal periods due to circumstances outside the control of the farm.

Example of Notification:
Example of Annual Derogation:

Example of Seasonal Derogation:
Milk suppliers can create up to 60 custom templates.

If you are requesting a second (or higher) derogation you must maintain an Affidavit from the farm indicating two steps being taken to try to bring the counts back into compliance or meet the other requirements for a renewal. A copy of this form is available on the Turkey Dairy Export Certification Program Website. Affidavit for Producer Corrective Action (doc)

Example of Affidavit for Corrective Action
Affidavit for Producer Corrective Action for Somatic Cell Count Derogation Renewal

I, ____________________________, hereby state and affirm that I am a bona fide milk producer and a member of (milk supplier), Member # ______. I am responsible for the milk production marketed under this (milk supplier) membership.

I make this statement of my own free will, absent of any threat, promise or inducement, whether real or implied.

1. During the past twelve months, I have made a good faith attempt to reduce my somatic cell count by performing the action(s) indicated:

   - Action plan developed in consultation with ____________________________, (milk supplier) field staff and/or other qualified individual(s)
   - Reviewed/updated mastitis control program with ____________________________, veterinarian and/or other qualified individual(s)
   - Reviewed milking equipment condition/sanitation protocols with ____________________________, equipment manufacturers and/or other qualified individual(s)
   - Reviewed/updated milking routine protocols with ____________________________, veterinarian and/or other qualified individual(s)
   - Routinely sampled individual cow milk for somatic cell count
   - Reviewed/updated culling program with emphasis on cows with history of high somatic cell count or mastitis
   - Other reasonable effort(s) to reduce somatic cell count (insert description):

2. I understand that one or more parties may rely upon the representations that I am making in this Affidavit. I hereby authorize (milk supplier) to disclose the fact that I have executed this Affidavit to customers to whom my milk is marketed.

3. I hereby acknowledge that from time to time (milk supplier) may be required to disclose the fact that I have executed this Affidavit to government or regulatory entities as required by law.

4. I understand that my eligibility for derogation under the USDA-AMS Turkey Health Certification Program is contingent upon the truthfulness of my responses herein and the completion of the actions to which I have attested.

I hereby swear and attest that the above is my true and valid statement.

Dated this ______ day of __________, ________

________________________________________
Signature

________________________________________
Printed name