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 a number of 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](http://www.eTDE.usda.gov) and will be directed to a profile page to request party and role association.

More information regarding eTDE registration and Frequently Asked Questions is available at [http://www.etde.usda.gov/eTDEHelpCenter_Dairy.aspx](http://www.etde.usda.gov/eTDEHelpCenter_Dairy.aspx)
1. Go to eTDE home – http://www.etde.usda.gov/

3. Select Create an Account
4. Select Create an Account

5. Select Register for a level 2 Account.
Once fully registered in eTDE, milk suppliers must go to the Electronic Document Creation System (eDocs) to apply for SPC and SCC Derogations.


7. 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’.
8. 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.
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)

Answers to Frequently Asked Questions for Derogations are available online: http://www.ams.usda.gov/AMSv1.0/DYGradingEUCellertificationFAQ
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