Agricultural Marketing Service Quality Assessment Division 1400 Independence Avenue SW, Stop 0258 Washington, DC 20250 GU0273AFA February 1, 2019 Page 1 of 3

Guidance Number GU0273AFA

Subject: Additional Requirements for the USDA NHTC Program

Distribution: QSVP Clients and auditors

Author(s): Diana L. Young
Position: Program Manager

Instructions: Save this Operational Guidance document for further reference. A controlled copy is located on the QAD server at ASB\Procedures\QAD Final.

1 Scope

This guidance is applicable to bovine. It is applicable to any operation that is a supplier to an approved USDA Quality System Assessment (QSA) Program under the USDA Non-Hormone Treated Cattle (NHTC) Program. Approved USDA programs must ensure that the requirements of this guidance are met.

2 Definitions

The following definitions apply to this document.

- 2.1 Auction Market: An operation where animals are purchased and sold. Also includes video and web operations.
- 2.2 Backgrounder-Stocker: An operation where animals are maintained, often on pasture or rangeland, to increase weight and maturity before being placed into a feedyard.
- 2.3 Claim: A specified process verified point within a PVP or a specified product requirement within a QSA Program.
- 2.4 Company: The approved USDA PVP or QSA Program that must meet the requirements.
- 2.5 Farm/Ranch of Origin: The location where an animal is born.
- 2.6 Feedyard: An operation that receives animals for feeding in preparation for harvest.
- 2.7 Producer: A person who operates a farm or ranch where animals are born (e.g.: cow-calf operation).
 - **NOTE:** A producer may have an additional operation, such as a backgrounder-stocker operation or a feedyard. In such instance, if all animals within the operation are considered non-conforming, then the producer should be considered only as a producer. However, the activities at the additional operation(s) and the risks associated with those activities must be considered during the evaluation of the producer.
- 2.8 Producer-Feeder: An operation that feeds animals born at the operation for harvest.

2.9 Supplier: A source of materials (including animals), service, or information input provided to a process or program.

3 Program Compliant Tags (PCT)

- 3.1 Individual animal identification through a PCT is required under the NHTC Program.
- 3.2 The use of a PCT allows animals to retain claims that do not change over time or location, such as date of birth (age), source, and breed, regardless of movement between approved and unapproved locations. If animals move from an unapproved to an approved location, then the approved location must read the PCT and access the individual animal information from the approved USDA program that enrolled the animal.

NOTE: If the claim may change over time or location, such as health, feeding, and/or management claims, then animals with must move from one approved location to another approved location even if a PCT is used.

- 3.3 If the company requires the use of a PCT, then the following requirements must be met:
 - a. A PCT is a one-time use, tamper-evident tag, which contains a non-repeatable, unique number. It may be an EID, RFID, or a visual tag. The company must provide evidence that the PCT meets these requirements.
 - b. The PCT must be applied (1) under an approved USDA PVP or QSA Program and (2) at the farm or ranch of birth or at an alternative location as approved on a case-by-case basis.
 - c. The company must control the use of PCT, including a documented procedure for tag allocation and an inventory record. The PCT inventory record:
 - i) May be maintained by either the company or the producer.
 - ii) Must include the tag number, the producer, and the associated claim(s).
 - iii) Should include dates of activity, the tag status, and changes of identify when a tag is replaced with another.

NOTE: Unused PCTs should be recorded within the company's program to strengthen inventory control.

4 Back Verification

4.1 The verification of claims for animals that have left the farm or ranch of origin may occur only if the claim does not change over time or location, such as date of birth (age), source, and breed. As a result, back verification cannot be used to enroll animals into the NHTC Program.



Agricultural Marketing Service Quality Assessment Division 1400 Independence Avenue SW, Stop 0258 Washington, DC 20250 GU0273AFA February 1, 2019 Page 3 of 3

If animals have not been verified prior to leaving the farm or ranch of origin, then they cannot be considered eligible for the NHTC Program.

5 Re-tagging

- 5.1 If a PCT is lost, re-tagging may only occur if a secondary form of individual identification is used. Acceptable secondary forms of identification include ranch tags and tattoos.
 - **NOTE 1:** Brands and ear notching are considered group identification. Group identification is not acceptable as a form of secondary identification and cannot be used to bring animals back into conformance under the NHTC Program.
 - **NOTE 2:** Individual cases can be presented to the USDA for review, and exceptions may be made on a case by case basis, at the discretion of the USDA.
- 5.2 Secondary identification must be cross referenced to the PCT that was lost and a record of the cross reference must be maintained and included with the shipping documentation.

Jeffery Waite, Branch Chief Quality Assessment Division Livestock and Poultry Program

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible Agency or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at How to File a Program Discrimination Complaint and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.