

Join LMA in Submitting Comments on USDA'S Proposed Rule on Approved Livestock Marketing Facilities and ADT

USDA has published a proposed rule on changes to the regulations on Approved Livestock Facilities and Animal Disease Traceability (ADT). **Stakeholders have until April 15, 2015 to provide comments.**

WHY SUBMIT COMMENTS

USDA will take comments received into consideration when making changes to the proposed regulation before it is finalized into law. The number of total comments matters as does the quality. While LMA will submit comments as an association, hearing from individual livestock markets affected will be very persuasive to USDA in making changes.

HOW TO SUBMIT COMMENTS

Submit comments online at <http://www.regulations.gov/#!submitComment;D=APHIS-2014-0018-0016>.

WHAT TO INCLUDE IN COMMENTS

The best comments are those that are personal to the submitter. Simply identify yourself, outline in clear but professional language any pieces of the proposed rule you would like to see changed, and provide a couple of reasons why.

If you have a personal story or concern, be sure to share that as well. For example, if you have a market close to a state line with many customers coming in from out of state, talk about this and how USDA's proposal would harm your business.

Here are a couple example points that can be included or adjusted to fit your individual situation:

- USDA's proposal to require a health certificate for adult cattle coming to a livestock market across state lines if not coming from a farm of origin will hinder my business and does not increase traceability. Once at my market, necessary information about these cattle is recorded and they are inspected by my market veterinarian. Requiring a health certificate before coming to market is an unnecessary expense for livestock producers.
- Defining farm of origin as any farm where livestock are produced or maintained for at least four months prior to movement does not work in the real world. This puts an unreasonable duty on me as a market owner to determine how long cattle have been at a specific location. Also, there is no benefit to the four month time frame and it is so long that it includes far more cattle than USDA claims to be targeting.
- The Livestock Marketing Facility agreement should remain in the regulations rather than a separate document. This agreement outlines my requirements and the formal process for submitting feedback should stay in place if USDA would like to make changes to these requirements.

LMA's draft comments are available here: <http://www.lmaweb.com/wp-content/uploads/2015/04/LMA-Draft-Comments-Proposed-Livestock-Marketing-Facility-Rule.pdf>. LMA members are welcome to copy and paste any or all of these comments to include in their own comments.

If you would like help reviewing your comments or drafting language for your comments, contact Chelsea Good at 816-305-9540 or cgood@lmaweb.com.

ADDITIONAL RESOURCES

LMA's summary of the rule may be found here –

<http://www.lmaweb.com/wp-content/uploads/2015/03/LMA-Comments-Approved-Livestock-Marketing-Facilities-Rule-April-2015.pdf>

The entire rule and supporting documents may be viewed here - <http://www.regulations.gov/#!documentDetail;D=APHIS-2014-0018-0016>.

A list of markets that are currently approved livestock markets may be found here - [http://www.aphis.usda.gov/wps/portal/aphis/ourfocus/animalhealth/sa_livestock_markets!/ut/p/a0/04_Sj9CPykssy0xPLMnMz0vMAfGjzOK9_D2MDJ0MjDzdgy1dDTz9wtx8LXzMjf09TPQLsh0VAZdihg!/.](http://www.aphis.usda.gov/wps/portal/aphis/ourfocus/animalhealth/sa_livestock_markets!/ut/p/a0/04_Sj9CPykssy0xPLMnMz0vMAfGjzOK9_D2MDJ0MjDzdgy1dDTz9wtx8LXzMjf09TPQLsh0VAZdihg!/)

If you would prefer to mail comments instead of submitting them online, they should be sent to:

Docket No. APHIS-2014-0018
Regulatory Analysis and Development, PPD, APHIS
Station 3A-03.8,
4700 River Road Unit 118
Riverdale, MD 20737-1238