



Texas and Southwestern Cattle Raisers Association

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The
Cattleman



January 30, 2017

Mrs. Amanda Bernhard
Texas Animal Health Commission
2105 Kramer Lane
Austin, Texas 78758

Submitted via electronic mail to comments@tahc.texas.gov

RE: Comments on the Texas Animal Health Commission rule proposal to amend Texas Administrative Code, Title 4, Part 2, Chapter 41, §41.8 relating to the dipping, treatment, and vaccination of animals for cattle fever ticks.

The Texas and Southwestern Cattle Raisers Association (TSCRA) appreciates the opportunity to comment on the Texas Animal Health Commission (TAHC) proposal to amend §41.8 of the Texas Administrative Code relating to the dipping, treatment, and vaccination of animals for cattle fever ticks.

TSCRA is a 140-year-old trade association and is the largest and oldest livestock organization based in Texas. TSCRA has more than 17,500 beef cattle operations, ranching families and businesses as members. These members represent approximately 55,000 individuals directly involved in ranching and beef production who manage 4 million head of cattle on 76 million acres of range and pasture land primarily in Texas and Oklahoma, but throughout the Southwest.

Cattle fever ticks pose a significant cattle health threat to the United States and could have detrimental effects on the cattle market and trade if not controlled. These factors make the ability of the TAHC to effectively eradicate cattle fever ticks from the U.S. of utmost importance to our industry. TSCRA strongly supports the efforts of TAHC in their surveillance, control, testing, and treatment of any livestock and/or wildlife that may serve as a host for cattle fever ticks, while recognizing the importance of cattle production in all quarantine zones.

TSCRA strongly supports TAHC's proposed amendment to §41.8 of the Texas Administrative Code which adds "*Unless otherwise determined by the [Designated Fever Tick Epidemiologist] and approved by the Executive Director, the following shall apply:*" prior to the requirements prescribed by that section.

As stated by the rule's preamble in the Texas Register, "*with routine inspections and treatment, cattle maintained on or near premises have significant value to the Cattle Fever Tick Eradication Program (CFTEP) by serving as sentinel animals, and if found, control agents of the fever tick.*"

The preamble also clarifies that *“the purpose of the amendment to §41.8 is to provide the Designated Fever Tick Epidemiologist (DFTE), with the approval of the Executive Director, the discretion to approve inspections, dipping, treatments and/or vaccination requirements that are less stringent than those currently prescribed, taking into consideration the circumstances of the affected producer, and the commission's overarching goal to encourage producers to maintain cattle on affected premises”*.

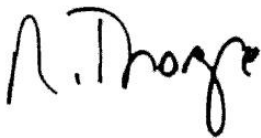
In many instances the requirements prescribed in §41.8 are unattainable given pasture size, labor available, livestock temperament and other unique gathering challenges of an affected property. Presently, ranchers are forced to vacate livestock from the premises when they cannot comply with current regulations.

The removal of cattle from a pasture impedes TAHC’s ability to effectively eradicate cattle fever ticks and abets the spread of these parasites to adjacent properties. When wildlife hosts are present, TAHC and ranchers relinquish our ability to curtail the cattle fever tick outbreak by removing the only host that can receive treatment year-round. With cattle removed from the equation the ability to mitigate this epidemic is considerably diminished.

TSCRA strongly urges TAHC staff to approve an attainable inspection and treatment regimen in situations that aren’t conducive for the currently prescribed requirements. TSCRA believes implementing a herd management plan that is reasonable for a cattle operation to comply with is paramount to the success of TAHC cattle fever tick eradication efforts.

Thank you for your service to the Texas cattle industry. Please contact Kaleb McLaurin at 512.469.0171 or kmclaurin@tscra.org if TSCRA can be of further assistance.

Sincerely,

A handwritten signature in black ink that reads "R. Thorpe". The signature is written in a cursive, slightly slanted style.

Richard Thorpe
President