

Traceability – No Paper Tiger

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There are those in the food industry that have viewed traceability as a bother, mere window dressing, a paper tiger. They don't understand why traceability is important; view the emerging regulations as a nuisance, something to be skirted with the minimum effort; and see traceability only as an added cost.

The recent decision by Japan to once again slam shut their border to American beef exports mere weeks after it was reopened should put to rest any notion that traceability regulations are a meaningless, bureaucratic, paper-pushing exercise. America's customer wants to send us a message that they are deeply serious about enforcing the rules. It took nearly two years of painstaking negotiation to rebuild trust in American beef and agree with our foreign trading partners about the specific procedures that would make them comfortable to once again buy American meat products. It took only a few short weeks to damage that trust. To the Japanese these traceability procedures and processes are now the new cost of doing business, and they want to show us they are willing to risk our longer-term trading relationships to ensure we get the message.

One could argue that sending a single, very small shipment of veal samples mistakenly containing beef vertebrae to a Japanese customer was not a big deal. We have seen a number of comments in the meat and cattle industry press that this very small shipment constituted industry teething problems with new regulations -- that you can't turn a huge, multi-stage and multi-faceted industry overnight. They say no real harm was done because the error was found -- the system worked. The Japanese beg to disagree. In their eyes the American system didn't work because they had to be the one to catch the mistake. American inspectors should have found the problem, not Japanese inspectors. And they're willing to take this one to the mat. The cost to the U.S. beef and cattle industry will be tens of millions of dollars a week, and the meter is running.

This new Japanese border closing sets the stage for discussions in the upcoming weeks about how the U.S. National Animal Identification System (NAIS) is to be finally implemented. After months of debate about whether databases that will store information about animal movements should be privately or publicly managed, the USDA, at the recent Farm Bureau convention, further clarified how they see NAIS being implemented. Back in September, USDA APHIS Veterinary Services Deputy Administrator Dr. John Clifford said the national animal identification database will be privately managed, and that USDA is looking for a single 24 x 7 x 365 interface or portal to the wide range of entities that will store animal movement information in privately managed databases. This message was reinforced at Dr. Clifford's subsequent talks at the USAHA convention in October and the Farm Bureau convention in early January. While the final USDA rule has not been formulated, the direction towards the U.S. using distributed databases rather than a single, centrally managed database appears to be solidifying. Some within USDA have taken to calling this distributed database approach a meta-database.

What does the NAIS data architecture and procedures have to do with the information required to support product exports? There is no direct relationship nor should there be. I am not confusing the purpose of the NAIS which is to provide 48 hour response within the U.S. livestock industry to an animal disease outbreak. The NAIS designed for disease control, not export verification. I understand this distinction and agree with it. The NAIS will contain very limited information about American livestock, only four basic information items -- the type of animal movement data event

(e.g., an animal is leaving a location, an animal is arriving at a new location, an animal has been seen at a specific location, an animal has been imported, an animal has been exported, etc.), the animal's identification number, the date of the event, and the premises identification number where the entry occurred. Nothing more and nothing less. These data are the basic information needed to preserve and protect public health, and the national database should be kept to this limited role.

While the NAIS database will not directly be used for export verification, its architecture, construction and implementation will speak volumes to our trading partners about how serious we are about traceability. If we implement a national system that lacks accountability and auditability we are telling our customers that we don't really care about traceability. And, given the recent Japanese response, I think that message will be ill-received.

It therefore behooves us to architect, build and operate the very best system we can using the meta-database approach so we show our allies traceability is important to us as a country. In the past, this column has referred to the meta-database concept under a number of different names – distributed databases, virtual databases, and data trustee. Whatever term you use, the concept remains the same. And we are very supportive of this meta-database approach because it has been shown in the past to work, and each and every one of us rely on this technology every single day.

In a meta-database environment, the government will not store all of the animal movement information identified above. These data will be stored in private databases and the government will access this information by querying an entity which knows how to talk to different database structures. The meta-database example that touches each and everyone of us every single day is the global, electronic credit card system. The information about your banking transactions are kept secure in the bank you have chosen, and the information about the banking transactions at the store where you make a purchase are stored in the bank the store has chosen to handle their financial affairs. It is only when you choose to buy something that a third-party entity which knows how to talk to your bank and how to talk to the merchant's bank gets into the picture. That third-party entity contacts the two banks and facilitates the transfer of information between them.

The NAIS meta-database can be handled exactly the same way. Individual producers and other stakeholders throughout the meat production chain will be able to choose which private database they want to use to store the four pieces of animal movement information. Many organizations have raised their hand to host such information, both at a national, regional and state level. Each of these organizations will inter-connect with the third-party entity that will provide the linking to USDA in the event a specific animal or its cohorts is implicated in an animal disease surveillance or investigation.

In order for the NAIS to demonstrate accountability and auditability, there are a large number of issues that must be addressed. Future columns will zero-in on the key decisions and analyze the pros and cons of alternatives. For the moment, though, it is sufficient to say that the NAIS cornerstone must be data integrity – how does someone who is using the NAIS database for disease control know that an entry in the database truly represents reality? There are a number of techniques that have been developed over the last few decades to answer this question which means we aren't starting at square one. We do, though, have to pick technology partners who understand and lived these issues.

As we go forward as an industry and finalize how we will track animals throughout their life, we need to be mindful that this so-called traceability paper tiger has very real teeth, especially with our East Asian trading partners. We need to ensure that the systems we put into place are realistic for our industry while still providing the traceability foundation required to provide the auditability and accountability for which our trading partners are willing to pay. Or have shown they are willing to stop paying if we don't follow the rules, to the letter.

Further information can be found at www.aginfolink.com.