

Outline Of Nevada Farm Bureau Thoughts On Proposed NAC 571 Regulations

Nevada Farm Bureau policy states: ***We support the operation of an effective Trichomoniasis program through regulation by the Nevada Department of Agriculture and dissemination of informational education.***

As we have reviewed the current regulations for Trichomoniasis we don't understand why changes are necessary to make the requirements be mandatory on a statewide basis with all bulls over the age of 12 months being tested annually. There must be something that we don't know about the existing regulations and why they haven't been more effective.

We also believe that cattle producers from across the state need to have the opportunity to participate through in-person workshops in their area of the state. We appreciate the addition of the Fallon workshop on November 29th, but we also maintain that unless workshops in Tonopah and Ely are provided, a large block of producers won't be able to receive the same opportunity for input as is being offered to the selected areas (Winnemucca, Elko and Fallon).

We believe that the existing regulations could be improved and made more effective while continuing without mandatory testing, statewide on an annual basis. First, we would like to offer a proposal for change to NAC 571.610 "Neighboring herd".

We suggest adding a new point 2, which would read "***2. Adjacent lands, private or public, where cattle could come into contact with cattle of another herd.***" This language would literally bring all adjacent land into the scope of potential vectors for transmission of the trich disease.

Further, we would like to have added language to ***NAC 571.654 Procedure upon receipt of positive test results to official test for trichomoniasis...***

New point 3 – "***3. The Director shall notify the owners of Neighboring herds of the infected bull and it's herd as an infected herd.***"

New point 4 – “4. *The Director shall require Neighboring herds to be tested for trichomonosis.*”

Re-number the remaining point.

NAC 57.656 Infected herd: Release from hold order...

Add on to the end of point 4 paragraph - “*All cattle from an infected herd and entering a slaughter channel, shall remain under quarantine until moved to slaughter. All infected cattle being moved from the premises of origin to a slaughter channel shall move on a form, or other documentation approved by the Department.*”

You many recognize that this language is also part of the proposed changes that have been brought forward in the package of regulations that the Department is offering. It is something that we agree with...enhancing the strength of the hold order and giving a greater reason for efforts to clean up the problem

As I said at the beginning, Nevada Farm Bureau policy says that we will support a program that will be effective. At this point in time we don't understand how the proposal for mandatory testing off all bulls in Nevada, over the age of 12 months, on an annual basis will be effective. We don't believe that there is sufficient veterinary reach across the state to make it work and we don't believe that the Department of Agriculture has the capacity or ability to do even what the current regulations call for – let alone operate in a command and control fashion across the entire state.

Lastly we want to direct our comments to the proposal for a new section – **NAC 571.667 – Limitations of transport and transfer of ownership...**

The implication that the Administrator or State Quarantine Officer “may” deny brand inspections or other services is not acceptable in our mind. First, the idea of using “may” (which also means some might not have the same burden placed on them) and just in general using brand inspections beyond the purpose of brands for commanding compliance. We believe that is an extremely slippery slope for trouble.