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Details:

(FORM UPDATED: 07/12/2010)

WISCONSIN STATE LEGISLATURE ... PUBLIC HEARING - COMMITTEE RECORDS

2007-08

(session year)

Assembly

(Assembly, Senate or Joint)

Committee on ... Agriculture (AC-Ag)

COMMITTEE NOTICES ...

- Committee Reports ... **CR**
- Executive Sessions ... **ES**
- Public Hearings ... **PH**
- Record of Comm. Proceedings ... **RCP**

INFORMATION COLLECTED BY COMMITTEE FOR AND AGAINST PROPOSAL

- Appointments ... **Appt**
 - Clearinghouse Rules ... **CRule**
 - Hearing Records ... bills and resolutions
 - (**ab** = Assembly Bill) (**ar** = Assembly Resolution)
 - (**sb** = Senate Bill) (**sr** = Senate Resolution)
 - Miscellaneous ... **Misc**
- (**ajr** = Assembly Joint Resolution)
(**sjr** = Senate Joint Resolution)



State of Wisconsin
Jim Doyle, Governor

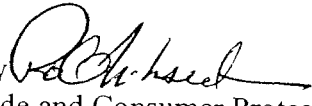
Department of Agriculture, Trade and Consumer Protection
Rod Nilsestuen, Secretary

DATE: August 12, 2008

TO: The Honorable Fred Risser
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Rule
07-107?

FROM: Rodney J. Nilsestuen, Secretary 
Department of Agriculture, Trade and Consumer Protection

SUBJECT: Animal Health and Disease Control; Final Draft Rule

The Department of Agriculture, Trade and Consumer Protection ("DATCP") is transmitting this rule for legislative committee review, as provided in s. 227.19(2) and (3), Stats. DATCP will publish notice of this referral in the Wisconsin Administrative Register, as provided in s. 227.19(2), Stats.

This rule modifies existing DATCP rules related to animal health and disease control. Among other things, this rule:

- Establishes new rules related to viral hemorrhagic septicemia (VHS) in fish, and simplifies registration of fish farms. This "permanent" VHS rule is similar, but not identical, to the temporary "emergency" VHS rules previously adopted by DATCP.
- Modifies current rules related to farm-raised deer, including rules related to herd registration, disease control, imports, movement and condemnation. Changes are consistent with proposed federal rules.
- Modifies current rules related to cattle, including rules related to voluntary Johne's disease testing and classification, tuberculosis import testing, and imports of cattle originating from Mexico.
- Modifies current rules related to poultry imports and enrollment in the national poultry improvement program.

Agriculture generates \$51.5 billion for Wisconsin

- Modifies current rules related to animal markets, dealers and truckers.
- Modifies current rules related to Wisconsin's livestock premises registration program. This rule extends the current registration period from one year to 3 years, for the convenience of registrants and to reduce program costs.
- Clarifies current disease indemnity appraisal procedures.

Makes minor drafting changes to update, clarify and correct current rules

Rule Contents

DATCP administers Wisconsin's animal health and disease control program. This rule modifies current DATCP rules under chs. ATCP 10 (animal diseases and movement), ATCP 12 (animal markets, dealers and truckers) and ATCP 17 (livestock premises registration).

Fish

Fish Farm Registrations

Under current rules, fish farm operators must register each fish farm as either a *type 1* or *type 2* fish farm, depending on the activities conducted at the fish farm. Under current rules, a fish farm operator may allow public fishing at a *type 1* or *type 2* fish farm, but may only sell or distribute fish from a *type 2* fish farm (there are limited exceptions).

This rule modifies the scope of a *type 2* fish farm registration, and creates a new *type 3* fish farm registration category. Under this rule:

- An operator may allow public fishing (including public fishing for a fee) at a *type 1*, *type 2* or *type 3* fish farm.
- An operator may not sell or distribute fish from a *type 1* fish farm (there are limited exceptions).
- An operator may sell or distribute fish from a *type 2* or *type 3* fish farm.
- An operator may not sell or distribute fish from a fish farm that receives any fish or fish eggs from wild sources unless that fish farm is registered as a *type 3* fish farm (there are limited exceptions).

This rule clarifies fish farm registrations:

- A fish farm registration is limited to a single fish farm location (a single land parcel or contiguous land parcels). All of the fish farm facilities on contiguous parcels may be registered as a single fish farm.
- Fish farms on non-contiguous land parcels must be registered as separate fish farms.
- A person may register 2 or more fish farms in a single application process.
- An operator may register 2 or more fish farms located on the same land parcel, or on contiguous land parcels, subject to the following conditions:
 - The fish farms must be “medically separated.” DATCP must inspect the fish farms to confirm that they are “medically separated” (DATCP will charge an inspection fee of \$400 per day of inspection).
 - Each fish farm is considered a separate fish farm for purposes of disease control and movement.
 - Fish or fish eggs moved between the fish farms must be accompanied by a fish health certificate, and the operator must keep a record of the movement.

Registrant Responsibility

This rule clarifies that a person who registers a fish farm is responsible for ensuring that fish farm operations comply with DATCP rules. However, this rule does not relieve other persons of liability for rule violations that they commit.

Viral Hemorrhagic Septicemia; Expanded Testing

VHS is a serious disease of fish. VHS has been found in Lake Michigan and the Lake Winnebago system, but has not yet been reported in any Wisconsin fish farm. The United States Department of Agriculture (USDA) has identified fish species that are known to be susceptible to VHS.

Current DATCP “permanent” rules require health certificates for all of the following:

- Fish and fish eggs (including bait) imported into Wisconsin.
- Fish and fish eggs stocked into Wisconsin public waters.
- Fish and fish eggs moved between Wisconsin fish farms.

Under current DATCP “permanent” rules, *import* health certificates must include VHS testing if the import shipment includes salmonids (salmon, trout, etc.) or originates from a state or province where VHS is known to occur. However, current “permanent” rules do not require VHS testing for any of the following:

- Fish or fish eggs stocked into Wisconsin public waters from *Wisconsin* sources.
- Bait fish or fish eggs originating from *Wisconsin* sources.
- Fish or fish eggs moved between Wisconsin fish farms.
- Non-salmonids imported from states (such as Minnesota) where VHS has not yet been found.

DATCP recently adopted temporary “emergency” rules to expand VHS testing requirements. This rule adopts those VHS testing requirements on a “permanent” basis. This rule is similar, but not identical, to the temporary emergency rules.

Under this rule, a fish health certificate and VHS testing are required for all of the following fish and fish eggs if they are of a *known VHS-susceptible species* and were either (1) collected from a wild source in any state within the preceding 12 months, or (2) kept on a *type 3* fish farm in this state:

- Fish or fish eggs stocked into Wisconsin public waters. There is a limited exemption (see below) for fish or fish eggs reintroduced to the same water body from which they are collected.
- Fish moved between Wisconsin fish farms, or from a Wisconsin fish farm to any other place (there are limited exemptions for fish shipped to food processing or retail food establishments).
- Fish or fish eggs distributed by a bait dealer for use as bait. The bait fish testing requirement will initially apply to emerald shiners (a known VHS-susceptible species), but will *not* initially apply to other major bait species such as fathead minnows, white suckers and golden shiners (which are not yet known to be VHS-susceptible). However, it could eventually apply to other species if USDA finds that those species are also VHS-susceptible. A retail bait dealer is not required to conduct duplicate tests on fish previously tested by a wholesale bait dealer.

This rule also does the following:

- Prohibits any person from selling bait fish *of any kind* if the seller has reason to know that the bait is affected with VHS or another reportable disease.
- Provides that a fish health certificate covering a fish farm or fish shipment becomes immediately void if fish or fish eggs not covered by a valid fish health certificate are added to the covered fish farm or fish shipment.

Fish Reintroduced to Same Water Body; Testing Exemption

Under this rule, fish or fish eggs reintroduced to the same public water body from which they are collected are exempt from VHS and other disease testing requirements if all of the following apply (a veterinarian or fish health inspector must still issue a fish health certificate based on a visual examination):

- DATCP issues a permit for the reintroduction.
- DNR approves the collection and reintroduction.
- The fish or fish eggs are not commingled with fish or fish eggs from any other water source.
- The fish or fish eggs are reintroduced into the same lake from which they were collected, or at the same point or a downstream point in the same river system from which they were collected.
- The fish or fish eggs are reintroduced within 30 days after they are collected, or within 30 days after the fish eggs hatch, whichever is later.
- The fish or fish eggs are reintroduced for the purpose of increasing or rehabilitating the population of a desirable sport fishing species.

Operator Moving Fish between the Operator's Own Fish Farms; Testing and Health Certificate Exemption

This rule clarifies that, when an operator (including DNR) moves fish or fish eggs between the operator's own fish farms in this state, the operator is exempt from health certificate requirements, VHS testing requirements, and other disease testing requirements under this rule unless the operator does one of the following:

- Moves fish or fish eggs from a *type 3* fish farm to a *type 1* or *type 2* fish farm.
- Moves fish or fish eggs between fish farms that are required to be medically separated.

A fish farm operator must make a record of each movement of fish or fish eggs between the operator's fish farms, regardless of whether health certificate or testing requirements apply. An operator may not move fish or fish eggs if the operator knows or has reason to know that the fish or fish eggs are affected with a reportable disease such as VHS. DATCP may also issue quarantine and other disease control orders to individual fish farm operators, as necessary.

VHS Test Reports

Under this rule, a veterinarian or fish health inspector who tests fish in this state for viral hemorrhagic septicemia (VHS) must report the test result to DATCP, regardless of whether the test result is positive or negative.

Farm-Raised Deer

Chronic Wasting Disease Test Reports

Under this rule, a veterinarian who tests a farm-raised deer in this state for chronic wasting disease must report the test result to DATCP, regardless of whether the test result is positive or negative.

Herd Registration; General

Under current rules, no person may keep farm-raised deer at any location in this state unless DATCP has issued a current annual registration certificate authorizing that person to keep farm-raised deer at that location. An annual registration certificate currently expires on December 31 of each year. This rule changes the annual expiration date to March 15, beginning with the first registration year beginning on or after the effective date of this rule.

One Registered Herd Kept at 2 or More Locations

This rule clarifies that a single registered farm-raised deer herd may include farm-raised deer kept at 2 or more locations, subject to the following conditions:

- All of the locations must be identified in the herd registration certificate.
- All of the herd locations must be actively enrolled in Wisconsin's chronic wasting disease herd status program.
- All farm-raised deer covered by the registration certificate must be treated as members of a single herd, for purposes of disease control and movement.

The registrant may move farm-raised deer between locations identified in the same herd registration certificate *without* a certificate of veterinary inspection if all of the following apply:

- Those farm-raised deer are identified with official individual identification.
- The registrant keeps a detailed record of the movement.

Two or More Registered Herds Kept at the Same Location

Under this rule, separately-registered farm-raised deer herds may be kept at the *same location* (even if they are owned by different registrants) subject to the following conditions:

“Medically separated” herds must be kept in separate enclosures, under conditions that effectively preclude disease transmission between the herds. DATCP must inspect “medically separated” herds to verify the separation. DATCP will charge an inspection fee of \$150 (\$200 after July 1, 2009), as provided in current rules.

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Under current rules, the owner of condemned farm-raised deer may apply for state indemnity payments. Under this rule, an application for indemnity payments must include proof of compliance with DATCP's condemnation order.

Chronic Wasting Disease Herd Status Program; Annual Census

Under current rules, no person may move farm-raised deer from a herd in this state unless the herd is enrolled in Wisconsin's chronic wasting disease herd status program. Enrollees must, among other things, submit an annual herd census to DATCP. Among other things, an annual herd census must report the number, species and sex of animals that have left the herd since the last annual census, and how those animals left the herd. Under this rule, an annual herd census must also include:

- A report of apparent escapes, including approximate escape dates and circumstances, and steps taken to prevent recurring escapes.
- An explanation and accounting for overall changes in herd population since the last annual census.
- Census verification by a Wisconsin certified veterinarian if required by the department.

Chronic Wasting Disease Herd Status Program; Failure to Comply with Testing Requirements

Under current rules, the owner of a herd enrolled in the chronic wasting disease herd status program must test every herd member, at least 16 months old, that dies or is slaughtered. Under current rules, DATCP may suspend a herd's enrollment if the herd owner willfully fails to test even a single test-eligible animal that dies or is slaughtered. However, some animals may die in wooded areas and not be discovered until it is too late to test them. In other cases, it may be hard to tell whether a missing animal died or escaped. So, absent evidence of a willful failure to test, DATCP normally applies an enforcement "tolerance" provided in current rules.

Under the current "tolerance," DATCP may summarily suspend a herd enrollment if the herd owner tested fewer than 92% of the farm-raised deer that died, escaped or were slaughtered in any 2 of the 5 preceding herd census years (including any farm-raised deer whose remains were not testable because of deterioration when found). This rule changes and clarifies the current "tolerance." Under this rule, DATCP may summarily suspend a herd enrollment if the herd owner does any of the following:

- Willfully fails to test any herd member, at least 16 months old, which dies or is slaughtered.
- Tests fewer than 90% of the farm-raised deer that die, escape or are slaughtered in *any* herd census year.

- If the herds are “medically separated:”
 - Each herd is considered a separate herd for purposes of disease control, movement, and enrollment in Wisconsin’s chronic wasting disease herd status program.
 - Farm-raised deer moved between any of the herds must be accompanied by a certificate of veterinary inspection, and registrants must keep a detailed record of each movement.
- If the herds are *not* “medically separated:”
 - All of the farm-raised deer covered by the herd registrations are collectively treated as a single herd for purposes of disease control and movement, regardless of location or ownership, and regardless of whether they are part of the same registered herd.
 - Farm-raised deer may be moved between any of the herd locations identified on any of the herd registration certificates, without a certificate of veterinary inspection, provided that they are identified with official individual identification. Registrants must keep detailed records of the movements.
 - All of the herds, including all locations covered by the herd registration certificates, must be actively enrolled in Wisconsin’s chronic wasting disease herd status program.

Chronic Wasting Disease Tests

Under this rule, a chronic wasting disease test sample must be collected from a farm-raised deer within 7 calendar days after the animal dies, or is killed or slaughtered (or within 7 calendar days after the death is first discovered). Under this rule, as under the current rules, the test sample must be sent to an approved laboratory within 10 calendar days after it is collected.

Condemnation of Farm-Raised Deer

This rule clarifies current rules related to DATCP condemnation of diseased or suspect farm-raised deer. Under this rule, a condemnation order may do all of the following:

- Specify a reasonable deadline for destruction of the condemned animals.
- Direct appropriate disease testing and disposition of the carcasses.
- Require the herd owner or custodian to enter into a “premises plan” as a condition to the payment of state indemnities. The “premises plan” may require the herd owner or custodian premises, or comply with other requirements that are reasonably designed to prevent the spread of disease. A “premises plan” may include a restrictive covenant, such as a fence maintenance requirement, that is binding on subsequent property owners for the duration of the agreement.

Under this rule, DATCP may reinstate a suspended herd enrollment if the herd owner does any of the following (DATCP may require other reinstatement conditions):

- Tests at least 95% of the deer that die, escape or are slaughtered in the *next* herd census year.
- Kills and tests, within 60 days of the summary suspension, a number of test-eligible animals equal to at least 90% of the number that the herd owner failed to test (during the census year in which the herd owner failed to meet the testing standard). An animal is test-eligible, for purposes of reinstatement testing, if it is at least 16 months old and has been in the herd for at least 120 days.

White-tailed Deer Herd; Fence Certificate

Under current law, fences for farm-raised white-tailed deer herds must be approved by DNR, and must comply with DNR rules. Under this rule, a person applying for a DATCP registration certificate to keep white-tailed deer must include, with the application, a copy of a valid DNR fence certificate for each registered location.

Hunting Preserves

Under current law, a person operating a farm-raised deer hunting preserve must hold a hunting preserve registration certificate from DATCP (a certificate is valid for 10 years). Current rules spell out hunting preserve registration standards and application requirements. Under this rule, an application for a hunting preserve registration certificate must also include all of the following:

- An estimate of the farm-raised deer population on the hunting preserve premises, by species, age and sex.
- The identification numbers of any farm-raised deer on the hunting preserve that bear identification numbers.

Under this rule, all non-natural additions to a hunting preserve must have 2 forms of official individual identification, one visible and one implanted.

Disease-Free Certification of Farm-Raised Deer

Certification Period

Under current rules, DATCP may certify a herd of farm-raised deer as brucellosis-free or tuberculosis-free, or both, based on herd test results provided by the herd owner. Participation is voluntary, but disease-free herd certification facilitates the sale and movement of farm-raised deer. Herd certification is generally governed by federal rules (“uniform methods and rules”) that DATCP has incorporated by reference in its rules.

Under current federal rules, tuberculosis-free herd certification is good for 3 years, while brucellosis-free herd certification is good for only 2 years. USDA proposes to harmonize the certification terms, but has not yet adopted the necessary rule changes. USDA has authorized DATCP to harmonize the terms in Wisconsin by state rule.

This rule extends brucellosis-free herd certification from 2 years to 3 years (a herd owner may request a shorter term), consistent with tuberculosis-free herd certification. That will allow herd owners to conduct simultaneous tests for both diseases. Simultaneous testing will reduce testing costs and limit stress on tested deer.

Testing for Certification

Under current federal rules, 2 whole herd tests are required in order to certify a farm-raised deer herd as a tuberculosis-free herd, while 3 whole herd tests are required in order to certify a farm-raised deer herd as a brucellosis-free herd. USDA proposes to harmonize the testing requirements, but has not yet adopted the necessary rule changes. USDA has authorized DATCP to harmonize the testing requirements in Wisconsin by state rule.

This rule reduces the number of whole herd tests required in order to certify a farm-raised deer herd as a brucellosis-free herd, from 3 whole herd tests to 2 whole herd tests, consistent with the testing requirement for tuberculosis-free herd certification.

This rule also clarifies that DATCP may transfer a herd certification to a new herd owner, or grant equivalent certification status to a new herd created from an existing certified herd, if the herd meets certification standards and the owner applies for certification within 90 days of acquiring the farm-raised deer.

Tuberculosis in Farm-Raised Deer

Under current rules, a farm-raised deer must be slaughtered within 15 days if it is found to be a tuberculosis reactor, except that DATCP may extend the slaughter deadline by up to 15 days. Under this rule, DATCP may extend the slaughter deadline by up to 30 days.

Importing Farm-Raised Deer

Farm-raised deer imported to this state must meet standards specified in current rules. Among other things, the imported animal must meet one of several alternative requirements related to tuberculosis status. This rule modifies current import standards, based on current federal standards for interstate movement. This rule eliminates current requirements for post-import

Moving Farm-Raised Deer Within Wisconsin

Farm-raised deer may not be moved from a registered herd in this state unless they meet standards specified in current rules (there are limited exemptions, including an exemption for animals shipped directly to slaughter). Among other things:

- The herd must have been continuously enrolled in Wisconsin's chronic wasting disease herd status program for at least 5 years. Under this rule, if 2 or more wild deer found or killed within 5 miles of the enrolled herd test positive for chronic wasting disease, the enrolled herd must also be enclosed by a DATCP-approved double fence to prevent contact with infected wild deer.
- The farm-raised deer must meet one of several alternative requirements related to tuberculosis status. Under *one* of the alternatives (other alternatives are available), a farm-raised deer may qualify for movement if it tests negative on 2 tuberculosis tests, where the 2nd test is performed within 360 days prior to movement. Under this rule, the second test under *this alternative* must be conducted within 90 days prior to movement.

Returning Escaped Farm-Raised Deer to a Herd

Under current rules, an escaped farm-raised deer must be reported within 24 hours. This rule clarifies that the herd owner must report the escape within 24 hours after the herd owner knows or has reason to know of the escape. The report must include the location of the escape, the apparent date and time of the escape, and the circumstances that resulted in the escape.

Under this rule, if an escaped farm-raised deer is returned to the herd, the herd owner must also report the return within 24 hours after it occurs. The report must include the apparent number of hours that elapsed between the escape and the return. If an escaped farm-raised deer is returned to the herd more than 72 hours after it escapes (24 hours if it escapes to a wild deer disease control area designated by DNR), it loses any status that it may have had under a herd certification or status program, and is treated as a new addition to the herd. That may affect the overall certification status of the herd (if an escaped animal is not returned to the herd, the herd's certification status is not affected).

Cattle

Johne's Disease Testing and Herd Classification

DATCP currently administers a voluntary herd testing and classification program related to Johne's disease in cattle. Herd testing and classification is conducted according to federal standards adopted by USDA. This rule incorporates the latest version (2006) of the USDA standards.

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Under current rules, Johne's disease test samples must be collected by an accredited veterinarian, by an individual working under direct supervision of an accredited veterinarian who submits the sample for testing, or by an authorized DATCP or USDA employee or agent. Under this rule, a milk sample for Johne's disease testing may also be collected by a Dairy Herd Improvement Association (DHIA) authorized technician or a certified veterinary technician.

Imported Cattle and Bison; TB Test Exemption

Current rules exempt imported bovine animals (cattle and bison) from the requirement of a pre-import tuberculosis test if the animals originate from a state that USDA has classified as "TB-free" if that state accepts Wisconsin animals without a TB test. Under this rule, the exemption does not apply if the state of origin has a confirmed TB-positive herd (until that herd is depopulated and all epidemiologically-linked herds have tested negative for TB).

Cattle and Bison from Mexico

Under this rule, no person may import an "M-branded" bovine animal (cattle or bison) to this state, except directly to slaughter. "M-branded" animals are animals branded with the letter "M" to signify that they have been imported from Mexico.

Poultry

National Poultry Improvement Plan Enrollment

Under current rules, a poultry flock owner may enroll the flock in the national poultry improvement program (DATCP administers the program in this state). Enrollment facilitates the sale and movement of poultry. Under this rule, a flock may not be enrolled in the program unless the flock premises have been registered under Wisconsin's livestock premises registration program (the premises ID number must be included on the enrollment application).

Showing Poultry

This rule clarifies that poultry enrolled in the National Poultry Improvement Plan or in the Wisconsin Tested Flock program may attend shows and exhibitions without losing status as long as all poultry at the show or exhibition have tested negative for pullorum, fowl typhoid and (in the case of turkeys) *Mycoplasma gallisepticum*.

Poultry Imports

valid certificate of veterinary inspection that certifies *all* of the following:

- They originate from flocks enrolled in the national poultry improvement plan.
- They originate from flocks classified as “U.S. pullorum-typhoid clean” and, in the case of turkeys and turkey eggs, “Mycoplasma gallisepticum clean” under the national poultry improvement plan.

This rule changes current poultry import requirements. Under this rule, poultry may not be imported to Wisconsin unless they are accompanied by a valid certificate of veterinary inspection that certifies *at least one* of the following:

- They originate from flocks enrolled in the national poultry improvement plan.
- They originate from flocks classified as “U.S. pullorum-typhoid clean” and, in the case of turkeys and turkey eggs, “Mycoplasma gallisepticum clean” under the national poultry improvement plan or under an equivalent plan approved by DATCP.
- All test-eligible birds have tested negative for pullorum, fowl typhoid and, in the case of turkeys, Mycoplasma gallisepticum within 90 days prior to import. Tested birds must bear official individual identification, and there may be no change of ownership between the test sampling date and the import date.

Llamas and Alpacas

Under this rule, a llama or alpaca imported to Wisconsin must be accompanied by a certificate of veterinary inspection that includes the official individual identification of the llama or alpaca.

Illegally Moved Animals

Under current rules, DATCP may issue a temporary animal holding order whenever DATCP has reason to believe that animals may have been illegally imported. DATCP may also order the destruction of an illegally imported animal. Under this rule, DATCP may also order temporary holding orders and destruction orders for animals that are illegally moved within this state.

Animal Markets

General

This rule does all of the following:

- Eliminates the current requirement for animal market operators to pass a test before being initially licensed by DATCP.
- Requires animal market operators to transport and handle animals in a safe and humane manner.
- Clarifies animal transport vehicle registration requirements.

- Requires animal market operators to record the official individual identification of goats, if the goats bear official individual identification.
- Requires animal market operators to record the livestock premises code, if any, of each premises from which the operator receives or to which the operator ships livestock.

Federally-Approved Livestock Import Markets

Under current rules, certain livestock imported to a federally-approved livestock import market in this state are exempt from Wisconsin import requirements, provided that they meet those requirements before *leaving* the market. Under this rule, before the animals leave the market, the market operator must also disclose the animals' state of origin to the animal purchaser.

Animal Dealers

This rule does all of the following:

- Eliminates the current requirement for animal dealers to pass a test before being initially licensed by DATCP.
- Requires animal dealers to transport and handle animals in a safe and humane manner.
- Clarifies animal transport vehicle registration requirements.
- Requires animal dealers to record the official individual identification of goats, if the goats bear official individual identification.
- Requires animal dealers to record the livestock premises code, if any, of each premises from which the dealer receives or to which the dealer ships livestock.

Animal Truckers

This rule does all of the following:

- Eliminates the current requirement for animal truckers to pass a test before being initially licensed by DATCP.
- Eliminates the current license exemption for animal truckers that haul animals for other persons fewer than 6 times per license year.
- Requires animal truckers to transport and handle animals in a safe and humane manner.
- Clarifies animal transport vehicle registration requirements.

- Requires animal truckers to record the livestock premises code, if any, of each premises from which the trucker receives or to which the trucker ships livestock.

Slaughter Establishments

Under current rules, no person may remove livestock from a slaughter establishment after the livestock have been weighed and purchased by the slaughter establishment. Under this rule, no person may remove livestock from a slaughter establishment after they have been off-loaded at the slaughter establishment.

Disease Indemnities

Under current law, DATCP may condemn and order the destruction of animals to prevent the spread of serious diseases. In some cases, the owner of the diseased animals may be eligible for state indemnity payments. Under this rule, if the owner of a diseased animal is eligible for state indemnities, and if the animal is of a type not frequently sold at public auction, DATCP must appoint a knowledgeable independent appraiser to determine the value of the animal. The appraiser must determine appraised value based on the animal's size, species, sex, and grade or quality, and by relevant information related to prevailing market prices for animals of that size, species, sex, and grade or quality.

Reportable Diseases

Under current rules, whenever certain diseases are diagnosed in this state, they must be reported to DATCP. Some diseases must be reported within one day, while other diseases must be reported within 10 days. This rule modifies the current list of diseases that must be reported within 10 days. The new list:

- Consolidates, but does not alter, the list of fish diseases that must be reported within 10 days. Some reportable fish diseases are currently listed in the rule text, while others are listed in an appendix. This rule consolidates all of them in the appendix.
- Corrects an error in the current list (Marek's disease is an avian disease, not a mollusk disease).

Prohibited Practices

This rule prohibits any person from selling, moving or disposing of a live animal that has been tested for a reportable disease, before the results of that disease test are known.

Livestock Premises Registration

Registration Renewal Period

Under current law, a person keeping livestock in this state must register each location where those livestock are kept. "Livestock" includes bovine animals, equine animals, goats, poultry, sheep, swine other than wild hogs, farm-raised deer, captive game birds, camelids, ratites and fish.

Under current DATCP rules, a person must renew a livestock premises registration every year. This rule extends the current renewal period, for the convenience of registrants and to reduce state costs. Under this rule, a registrant will only be required to renew a registration once every 3 years.

Who May Register

Under current rules, if *person A* feeds and cares for livestock owned by *person B*, on premises owned by *person C*, any of those persons may register the premises (the others need not). However, if the premises are part of an operation (such as a dairy farm) that DATCP licenses under other applicable law, current rules provide that *only the license holder* may register the premises. This rule eliminates that restriction, so that any eligible person (including, but not limited to, the license holder) may register the premises. This rule retains a current rule provision which allows an applicant for an initial license (such as an initial dairy farm license) to register the livestock premises as part of that initial license application.

Other Changes

This rule makes a number of other minor drafting changes designed to update, clarify and correct current rules.

Public Hearings

DATCP held 3 public hearings on this rule. DATCP held the hearings on January 7, 2008 in Appleton, January 8, 2008 in Madison and January 10, 2008 in Eau Claire. Written comments were accepted until January 25, 2008. The hearings were well attended: 41 people testified or registered. DATCP also received a large number of written comments. A large share of the comments opposed a livestock premises registration provision that has been *removed* from this final draft rule (see tally and explanation below):

Topic	Position	Registered	Testified	Written*	TOTALS
Premises	Opposed	1	22	153	176
	Support				
NAIS	Opposed	1		6	7
	Support				0
All	Opposed	5	2	23	30
	Support				0
Fish Health	Opposed			2	2
	Support				0
	Information/Suggested changes	1	2	2	6
Johne's	Opposed				0
	Support w/Amendment		1		1
Farm-Raised Deer	Opposed		1		1
	Support w/Amendment		1		1
	Suggested changes			4	4
Poultry	Opposed		1		1
	Support w/Amendment	1			1
	Information Only	1			1
TOTALS		11	30	198	235

* Some comments were on multiple topics

A full summary of hearing comments is attached. Comments generally fell into the following categories:

Livestock Premises Registration

- Completely opposed to Wisconsin's livestock premises registration law, and anything related to the proposed National Animal Identification System (NAIS).
- Opposed provision that would allow DATCP to register premises without the owner's express authorization. (*NOTE: this provision has been removed from the final draft rule.*)
- Opposed the requirement for animal markets, dealers and truckers to record premises registration numbers of livestock shipment source and destination points. (*NOTE: The rule only requires livestock markets, dealers and truckers to record premises codes if available. It does not prohibit the handling of animals whose premises codes are not available.*)

Johne's Disease

- Supported the rule, including provision allowing DHIA technicians to collect milk samples for testing. (*NOTE:* In response to hearing testimony, the final draft rule also allows certified veterinarian technicians to collect milk samples for testing.)

Fish Health

- Opposed VHS testing requirements, especially for small fish farms.
- Asked DATCP to limit or modify VHS testing requirements.
- Asked DATCP to expand VHS testing requirements.

(*NOTE:* The final draft rule retains VHS testing requirements with slight modifications. The final draft “permanent” rule is similar, but not identical to the temporary “emergency” rules already adopted. The final draft reduces testing requirements for fish returned to the same wild source from which they were collected – to facilitate sport fish enhancement programs.)

Farm-raised deer

- Opposed changing chronic wasting disease test-eligible population from deer at least 16 months old to deer at least 8 months old. (*NOTE:* the final draft retains the current 16-month-old testing threshold, but allows for change to 8-months-old if mandated by USDA.)
- Opposed requirement to have a veterinarian certify the required annual herd census. (*NOTE:* the final draft does not require veterinarian certification in every case, but DATCP may require it as needed – for example, if there are discrepancies or if USDA requires veterinarian certification.)
- Supported changes to tuberculosis-free and brucellosis-free herd certification procedures, and asked for further changes to brucellosis-free herd certification procedures. (*NOTE:* the final draft makes further suggested changes.)
- Opposed changes in TB testing requirements for farm-raised deer imports. (*NOTE:* the final draft rule is consistent with USDA standards for interstate movement, and eliminates post-import testing requirements.)

Poultry

- Requested technical clarification related to National Poultry Improvement Program. (*NOTE:* the final draft rule includes the requested clarification.)

Changes from Hearing Draft

Following public hearings, DATCP made a number of changes to the hearing draft rule:

Fish Health

- The final draft clarifies fish farm registration requirements and procedures:
 - Creates a *type 3* fish farm registration category (fish farms that obtain fish from wild sources, and sell or distribute fish from the fish farm).
 - Clarifies procedures for registering fish farms at multiple locations (fish farms on non-contiguous land parcels must be registered as separate fish farms, but that can be done with a single application).
 - Allows an operator to register more than one fish farm at a single location, if the fish farms are medically separated.
- The final draft clarifies fish health certificate and VHS testing requirements, including requirements for fish moved from or between fish farms in this state (there are exemptions for certain movements between fish farms registered by the same operator, and for shipments to certain food processing and food retail facilities).
- The final draft exempts, from VHS testing requirements, fish that are returned to the same wild source from which they were collected in order to enhance sport fish populations (a DATCP permit is required).

Farm-Raised Deer

- The final draft clarifies chronic wasting disease testing requirements for farm-raised deer. Under this rule, *as under current rules*, animals at least 16 months old (*not* 8 months old, unless required by USDA) must be tested for CWD when they die or are slaughtered. Under this rule, test samples must be collected within 7 days after the animal dies or is slaughtered, or within 7 days after the death is first discovered. Under this rule, *as under the current rule*, test samples must be submitted for testing within 10 days after they are collected.
- The final draft clarifies that DATCP may suspend a herd's enrollment in the chronic wasting disease herd status program if the herd owner willfully fails to test any test-eligible animal, or fails for any reason to test at least 90% of test-eligible animals in any census year. The final draft specifies conditions under which DATCP may reinstate a suspension.
- The final draft clarifies annual herd census and escape reporting requirements. If an escaped animal is returned to the herd, the herd owner must report the return (a delayed return may affect the herd's disease-free certification or status).
- The final draft simplifies testing requirements under the brucellosis-free herd certification program.

- The final draft allows continued enrollment, in the chronic wasting disease herd status program, of herds located in wild deer chronic wasting disease control areas designated by DNR (enrollment permits deer movement from the herd). However, if 2 or more wild deer found or killed within 5 miles of the farm-raised deer herd test positive for chronic wasting disease, enrollment will be suspended unless the herd is enclosed within a double fence that effectively prevents contact with diseased wild deer.

Livestock Premises Registration

- The final draft deletes a hearing draft provision that would have authorized DATCP to register livestock premises without the owner's explicit authorization.

Other Changes

The final draft also makes the following changes to the hearing draft:

- Allows certified veterinary technicians to collect milk samples for Johne's disease testing.
- Clarifies standards under the National Poultry Improvement Program, including flock commingling standards (NPIP flocks can be commingled with other tested birds at shows and exhibitions).

Response to Rules Clearinghouse Comments

DATCP modified the final draft rule to address all of the comments from the Legislative Council Rules Clearinghouse.

Fiscal Impact

This rule will not have a significant state or local fiscal impact, except that the fish health provisions of this rule will have the following impact on DNR and DATCP (a complete fiscal estimate is attached):

Impact on DNR

This rule will have a fiscal impact on DNR fish hatchery and stocking operations. Under this rule, all VHS-susceptible fish and fish eggs (including VHS-susceptible bait species) must be tested for VHS before being stocked to Wisconsin public waters if they were either (1) collected from a wild source within the preceding 12 months or (2) kept on a *type 3* fish farm in this state.

are state-owned fish hatcheries. The remainder are registered by DNR but owned by private DNR "cooperators" (as registrant, DNR assumes legal responsibility for compliance with fish health rules). DATCP estimates that DNR will need to conduct VHS tests on a combined total of approximately 120 lots of fish per year (including fish at state hatcheries and "cooperator" fish farms registered by DNR).

Assuming an average test cost of \$500 per lot, the total cost to DNR would be approximately \$60,000 per year. However, DNR has already implemented a number of internal controls and VHS testing protocols, so the added cost of this rule will be less than \$60,000. DNR costs may increase if USDA finds that additional fish species are susceptible to VHS (the amount of the increase will depend on which fish species are found to be susceptible).

Under this rule, fish and fish eggs are exempt from VHS and other fish health testing requirements if they are reintroduced into the same body of water from which they were collected, for the purpose of increasing or rehabilitating a desirable sport fish population. (DATCP and DNR must approve the reintroduction, and a veterinarian or fish health inspector must still issue a fish health certificate based on a visual inspection.) This exemption will make it easier for DNR, local governments and others to continue programs (including so-called "walleye wagon" programs) to supplement the natural reproduction of important sport fish species.

Impact on DATCP

DATCP expects to incur added costs to administer and enforce the fish health testing requirements under this rule. DATCP estimates that 2.0 FTE positions will be needed to review and process a large volume of fish health certificates in a timely manner; to train fish health inspectors to collect samples for VHS testing; to provide compliance information and respond to industry inquiries; to conduct inspections and monitor compliance; to conduct investigations of possible law violations; and to initiate enforcement actions if necessary.

The 2.0 FTE staff will have a combined total cost of approximately \$120,000 per year, including salary, fringe benefits and support costs. DATCP will absorb these costs in the short term by shifting staff from other important disease control responsibilities, but DATCP will not be able to do so indefinitely without putting other livestock sectors at unacceptable risk. DATCP has received some federal grant funds to cover some of the costs, but federal funding is not guaranteed to continue.

Business Impact

Aquaculture

Effect on Private Fish Farm Operators

DATCP estimates that VHS testing requirements under this rule will affect 30-40 private fish farms, not counting DNR "cooperator" fish farms registered by DNR (see state fiscal impact above). The combined total cost to all affected private fish farm operators will be approximately \$20,000 per year. However, some of those affected fish farmers are already performing VHS tests in order to meet federal requirements for shipping fish in interstate commerce, so the net impact of this rule may be less than \$20,000. Fish farm costs may increase if USDA finds that additional fish species are susceptible to VHS (the amount of the increase will depend on which fish species are found to be susceptible).

Effect on Bait Dealers

The VHS testing requirements under this rule will have an immediate impact on approximately 25 Wisconsin bait dealers who are currently harvesting emerald shiners from the wild (emerald shiners are the only bait species known to be susceptible to VHS at this time). VHS testing costs may deter wild harvesting of emerald shiners for sale as bait, but affected bait dealers may still harvest and sell other types of bait (emerald shiners comprise only about 10% of the bait market).

Bait dealers that are not currently harvesting emerald shiners will not be substantially affected by this rule unless USDA finds that additional bait species are susceptible to VHS. If USDA finds that other major bait species are susceptible, this rule could have a more dramatic impact on bait dealers. The impact will depend on the species that are affected.

Farm-Raised Deer Keepers

This rule will help control chronic wasting disease and other diseases, for the benefit of the entire farm-raised deer industry, and will make state rules consistent with federal rules. This rule will have minimal impact on most individual operators, and will reduce costs and facilitate deer farm operations in many cases. Some operators may have slight increased costs for fencing, record keeping or animal identification, but fencing costs may be reimbursed by USDA.

Cattle and Goat Producers

This rule allows dairy herd improvement technicians and certified veterinarian technicians to collect milk samples that are used as Johne's disease test samples. That will make it easier, and less costly, for many dairy farmers to participate in the Johne's disease herd testing and management program.

This rule clarifies and strengthens some cattle import restrictions, for the protection of Wisconsin's livestock industry. Import rules will not have significant adverse effects on the livestock industry.

Poultry Producers

This rule will have no adverse effects on poultry producers. It will give poultry importers and exhibitors more flexible movement options, without weakening disease protection.

Animal Markets, Dealers and Truckers

This rule will simplify licensing of animal market operators, dealers and truckers, by eliminating current knowledge testing requirements. This rule will require some animal market operators, dealers and truckers to make minor changes in recordkeeping and operating procedures. Recordkeeping changes will improve disease control and traceback capability, for the benefit of the entire livestock industry. This rule will not have any significant adverse effect on animal market operators, dealers or truckers.

Persons Keeping Livestock; Premises Registration

Under current law, a person who keeps livestock at a location in this state is required to register that location with DATCP. This rule does not expand or modify current registration requirements, except that this rule will make it easier and more convenient to register. Among other things, this rule will extend the registration renewal period from one year to 3 years. This rule will not increase costs or compliance requirements for livestock operators.

Other Affected Businesses

This rule will not have any significant adverse impact on other affected businesses. This rule will clarify current rules, and improve disease control, for the benefit of the entire livestock industry.

Small Business Accommodation

DATCP has not exempted small businesses from this rule, because the risk of disease spread is unrelated to business size.

Environmental Impact

This will have a positive impact on the environment, by helping to prevent the spread of serious diseases, including diseases like tuberculosis, VHS and CWD, which affect wild animal populations and public resources. This rule will not have any negative environmental impact.

Federal and Surrounding State Programs

Federal Programs

DATCP administers animal disease control programs in cooperation with USDA. USDA has well-established control programs for historically important diseases such as tuberculosis and brucellosis. Federal rules for these programs spell out standards for disease testing, disease control, international and interstate movement of animals, certifying the disease status of states, and certifying the disease status of individual herds.

USDA operates national veterinary diagnostic laboratories, and coordinates multi-state responses to major disease epidemics. USDA exercises disease control authority, including quarantine and condemnation authority, and provides funding for indemnity payments to certain owners of condemned animals. USDA operates state and regional offices, and coordinates field operations with states.

USDA has less well-developed programs for new or localized diseases, or emerging animal-based industries. States often take a lead role in developing programs to address new animal health issues and disease threats (farm-raised deer and fish diseases, for example), particularly if those issues or threats have a more local or regional focus. Wisconsin's program related to fish and farm-raised deer are perhaps the leading programs in the nation, and have provided models for proposed federal programs.

USDA may provide grant funding, regulatory incentives, or other assistance in support of state programs and regulation. For example, USDA provides funding for voluntary Johne's disease testing and herd management, based on federal program standards.

States have independent authority to regulate animal health and movement, including imports from other states. However, states strive for reasonable consistency, based on standards spelled out in federal regulations. Where well-established federal standards and procedures exist, state disease control programs typically incorporate those federal standards. However, states may independently address new and emerging disease issues, especially if those issues have a state or regional focus and are not a priority for USDA.

Surrounding State Programs

General

Surrounding state animal health programs are broadly comparable to those in Wisconsin, but vary in a variety of ways. Differences in disease regulations and control programs may reflect differences in animal populations, animal-based industries, and disease threats in the different states. Programs for historically important diseases, such as tuberculosis and brucellosis, tend to be fairly similar between states and are based on well-established federal standards. Programs for newer forms of agriculture, such as farm-raised deer and aquaculture, tend to be more variable.

Aquaculture

All of the surrounding states regulate aquaculture, to some degree:

- Minnesota requires fish import permits, and licenses fish farms and fish dealers. Health certification is required for fish imports, but not for fish farms. Bait imports are prohibited.
- Iowa requires fish import permits, and licenses fish farms. Health certification is required for fish imports, but not for fish farms.

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- Illinois licenses fish farms and fish dealers. An import permit and health certification is required for certain fish imports (salmonids). There is limited regulation of fish transport vehicles.
- Michigan licenses fish farms. Health certification is required for fish imports.

Johne's Disease

All of the surrounding states (Illinois, Michigan, Iowa and Minnesota) have adopted a voluntary Johne's disease testing and herd management program, based on the federal program. Wisconsin has a similar program, which it is updating under this rule.

WRITTEN

1	Augusta	Oppose	Daniel Kurtz	All proposed Changes	Mailed in comment card	Written						
2	Taylor	oppose	Jonas Borntrager	All proposed Changes	Religiously opposed to all premises registration and all animal ID.	Written						
3	Medford	Oppose	Clarence Miller	All proposed Changes	This program will drive small producers out of the market, will make people abandon raising animals for their own food, will invade americans personal privacy to a degree never before tolerated, and will violate the religious freedom of americans.	Written						
4	Fairchild	Oppose	Joe W. Yoder	All proposed Changes	Sent in public hearing registration: Opposed to changes in fish health requirements; farm-raised deer regs; trucker, dealer, or market regs; & premises registration changes because its against his "believes."							
5	Etrick	Oppose	Jerry D. Stutzman	All proposed Changes	Sent in public hearing card. Opposed to all premises registration and animal ID. Opposed to rule changes for fish requirements, deer farm regulations, premises regulations, & trucker/dealer/market regulations.							
6	Fairchild	Oppose	Moses A. Borntrager	All proposed Changes	Sent in public hearing card. Opposed to all premises registration and animal ID. Opposed to rule changes for fish requirements, deer farm regulations, premises regulations, & trucker/dealer/market regulations.							
7	Medford	Oppose	Ervin J. Miller	All proposed Changes	Sent in public hearing card. Opposed to rule changes for fish requirements, deer farm regulations, premises regulations, & trucker/dealer/market regulations. Says it's against his constitutional rights.							
8	Fairchild	Oppose	John D. Bontreger	All proposed Changes	Sent in public hearing card. Opposed to all premises registration and animal ID. Opposed to rule changes for fish requirements, deer farm regulations, premises regulations, & trucker/dealer/market regulations.							
9	Taylor	Oppose	Joe S. Bontreger	All proposed Changes	Sent in public hearing card. Religiously opposed to all premises registration and animal ID. Opposed to rule changes for fish requirements, deer farm regulations, premises regulations, & trucker/dealer/market regulations. Willing to give							

					name when they buy and sell livestock.	
10	Granton	Oppose	Ben Borntrager	All proposed Changes	Sent in public hearing card. Wrote down that is opposed to all sections on sheet.	
11	Meirose	Oppose	Floyd Yoder	All proposed Changes	Sent in public hearing card. Religiously opposed to all premises registration and animal ID. Opposed to rule changes for fish requirement deer farm regulations, premises regulations, & trucker/dealer/market regulations.	
12	Taylor	Oppose	Dan S. & Lena N. Borntrager	All proposed Changes	Sent in public hearing card. Religiously opposed to having their premises registered b/c they want no part of the 3 phases of NAIS. Opposed to changes in fish requirements; farm-raised deer regulations; premises registration; & trucker, dealer, or market regulations.	
13	Augusta	Oppose	Levi Hershberger	All proposed Changes	Sent in public hearing card. Checked every opposition box on the sheet.	
14	Fairchild	Oppose	Daniel E. & Rosanna J. Borntrager	All proposed Changes	Sent in public hearing card. Checked every opposition box on the sheet. Opposed premises/ID b/c they are afraid of what will come next.	
15	Augusta	Oppose	Raymond D. Miller	All proposed Changes	Sent in public hearing card. Checked every opposition box on the sheet except the "other" section.	
16	Medford	Oppose	Harley C. Miller	All proposed Changes	Sent in public hearing card. Religiously opposed to all premises registration and animal ID. Opposed to rule changes for fish requirement: deer farm regulations, premises regulations, & trucker/dealer/market regulations.	
17	Taylor	Oppose	Chris T. Borntrager	All proposed Changes	Sent in public hearing card. Religiously opposed to all premises registration and animal ID. Opposed to rule changes for fish requirements: deer farm regulations, premises regulations, & trucker/dealer/market regulations. Willing to give name when they buy and sell livestock.	
18	Augusta	Oppose	Felty Borntrager	Farm-raised Deer: Premises: TMD	Mailed in comment card	

19	Augusta	Oppose	Phineas A. Bontrager	Farm-raised Deer; Premises; trucker, dealer, or market	Sent in public hearing card. Opposed to rule changes for farm-raised deer, premises, and trucker, dealer, or market regulations.
20	Augusta	Oppose	Felty F. Bontrager	Farm-raised Deer; Premises; trucker, dealer, or market	Sent in public hearing card. Opposed to changes in farm-raised deer regulations, premises regulations, and trucker, dealer, or market regulations. Opposes premises regulation for religious reasons and constitutional rights.
21	Augusta	Oppose	William E. Bontrager	Farm-raised Deer; Premises; trucker, dealer, or market	Sent in public hearing card. Opposed to changes in farm-raised deer regulations, premises registration regulations, and trucker, dealer, or market regulations. Doesn't think the changes to premises "will be for the good."
22	New Auburn	Oppose	Jessica Cordell	Farm-raised Deer; Premises; trucker, dealer, or market	Sent in public hearing card. Religiously opposed to all premises registration and all animal ID. Also opposed to farm-raised deer regs and trucker, dealer, or market regs. Also worried about the health risks of inserting chips into animals.
23	Fairchild	Oppose	Joni L. & Elizabeth D. Borntreger	Fish health, farm-raised deer, premises, & building inspection & land/building permits	Sent in public hearing card. Opposed to fish health requirements; farm-raised deer regs; premises regs - "no longer a free country"; also against building inspection as well as land & building permit use.

1	Madison	Comment	WI Fish and Bait Dealer Association	Fish Health	ATCP 10.645 appears to overstep DNR authority, it is also unclear who it applies to and when testing is required. ATCP 10.645 create some way for a fish operations separated and allow for the handling of susceptible species with continued release of the whole farm. The proposed rule should be revised to limit stocking and wild stock transfers under limited conditions designed to avoid the spread of VHS or other fish diseases. ATCP 10.645 falls short in establishing comprehensive fish health standards for in Wisconsin, particularly FHC require APHIS non-listed fish species distribution. The Department recommends the establishment of comprehensive fish health standards of distribution and sale of all species of fish harvested under the provisions of s. 29.09, Stats. For purposes of interpreting and reviewing Health Certificates during the issuance of stocking permits under Ch. 29, Stats., unclear what is covered by an FHC (i.e. groups, premises registration, or farm registration).	P's to and (b)3 ing of flow fry certain pread of wild bait nts for as bait. shment or the fish 09, For sh WDNR appears ots, age
2	Madison	Comment	WI DNR	Fish Health	30 DAY FHC: concerned that MN fish deemed to be wild and can only get a health certificate. While SD is deemed and qualifies for the annual health certificate. 30 day fish health certificate with a 30 day approval window by DATCP is to short TESTING: Working on what needs to be tested is confusing. Small fish farmers will not be able to afford these testing costs and they will be required of business	3 day fish med ate. A /HS rb ted out
3	Stevens Point	Comment	Gollon brother Wholesale Live Bait, Inc.	Fish Health		
4		Opposed	Jim and Eileen Michalski	Fish Health		
5	Menomonie	Opposed	Herby Radmann - The Bullfrog's Eat My Fish Farm	Fish Health	Rules do not have appropriate regard for farms. Health certificate for fish movement be based on risks.	small nt should

1	Madison	Support	Peter Giacomini - AgSource Cooperative Services	Johne's	The proposed rule change is a simple, no cost way to take advantage of existing infrastructure that will advance control of Johne's disease. We encourage support.
2		Comment	DATCP	Johne's	Premises ID should be a requirement for participation in program in order to get reimbursed or certified or to vaccinate
3	Madison	Support	Wisconsin Farm Bureau Federation - Jeff Lyon, Director, Governmental Relations	Johne's, premises	Supports ATCP 10.15(1)(d) Johne's disease milk sample tests. Also supports rule change to make premises renewal every 3 yrs. Supports the decision to make premises registration free (opposes fees on producers to pay for premises registration). Supports premises registration itself "all livestock premises need to be registered."

1		Oppose	Jacob L. Stoltzfus	NAIS	Religiously opposed to animal ID.
2	Fairchild	Oppose	Clemens W. Bornreger	NAIS	Religiously opposed to NAIS.
3	skfarms	Oppose		NAIS	Opposed to a surveillance society
4	Madison	Oppose	Dina Corigliano - Sustainable Design Solutions	NAIS	Opposed to NAIS. Says NAIS is another attempt by corporate ag. & computer chip companies to drive local, small farms out of business. "Tagging the animals is with chips is not going to keep our food supply safe."
5	pat_zietlow@centurytel.net	Oppose	Donnell & Patricia Zietlow	NAIS	Opposed to animal tagging - animal ID.
6	Unknown	Oppose	Unknown	NAIS	Opposed to the proposed premises registration rule change which allows DATCP to register premises.
1	Bloomington	Oppose	Glen Miller	premises	Opposed to the 1-2-3 step of the protocols of NAIS for three reason 1) On religious grounds, 2) Violates right to privacy, 3) Concerned with losing the small family oriented farms.

2	Granton	Oppose	Andy E Bontrager	premises	Does not approve of the premises being on anyone that is opposed to as a violation of their constitutional rights or religious beliefs. Specifically opposed to the premises located on the corner of 14th and 9th streets. There are approximately 104 Amish churches in this district. The Amish do not have internet access in their homes. We do not want to be a part of this.	pushed on of iffs. number. ch district rized have rt in it. or privacy. by and ve to and ad - or
3	Fairchild	Oppose	Eddie Gingerich	premises	There are approximately 104 Amish churches in Wisconsin with approximately 150 persons per church. The Amish do not have internet access in their homes. We do not want to be a part of this.	or privacy. by and ve to and ad - or
4	Granton	Oppose	Aaron Yoder	premises	DATCP does not need any more control. This (premisses) is an invasion of privacy. DATCP is catering to the big mega farms by letting them off the hook on some regulations that the small family farms must comply with. DATCP should reconsider exempting people who are religiously opposed to the internet, or want to be a part of this.	or privacy. by and ve to and ad - or
5	Granton	Oppose	Levi Mast	premises	Opposed to premises registration and to follow: Animal registration, etc. Not the system that is in place now and has been for many years.	that is posed to worked
6	Granton	Oppose	Adin Stutzman	premises	Opposed to all premises and regulation animal ID. Read revelation ch 14 ver 9	and
7	Taylor	Oppose	Lavern Lehman	premises	Religiously opposed to all premises registration and all animal ID.	ration
8	Viroqua	Oppose	Daphne Kingsley	premises	Adamantly against any implementation of National Animal Identification System for the State of Wisconsin. This is an invasion of personal property, as well as an infringement on civil liberties of animal owners.	a e in the provacy ment
9	Augusta	Oppose	Andy Mast	premises	Religiously opposed to all premises registration and all animal ID.	ration
10	Granton	Oppose	David B Borntrager	premises	Opposed to premises ID and Animal ID	
11	Etrick	Oppose	Chris C Borntrager	premises	Religiously opposed to all premises registration and all animal ID.	ration
12	Meirose	Oppose	Amos A Borntrager	premises	Opposed to all premises registration and all animal ID.	animal
13	Hixton	Oppose	John and Katie Shetler	premises	Oppose all phases of the NAIS system of our religion.	cause
14	Fairchild	Oppose	John Bontrager	premises	Mailed in comment card- marked oppose	

15	Osseo	Oppose	Eli Shetler	premises	Religiously opposed to all premises registration and all animal ID.
16	Fairchild	Oppose	Amos C Borntrager	premises	Religiously opposed to all premises registration and all animal ID.
17	Osseo	Oppose	Henry & Sadie Miller	premises	Religiously opposed to all premises registration and all animal ID.
18	Fairchild	Oppose	William Borntrager	premises	Religiously opposed to all premises registration and all animal ID.
19	Augusta	Oppose	Freddie Yoder	premises	Opposed to all premises registration and animal ID.
20	Fairchild	Oppose	Andy Gingerich	premises	Religiously opposed to all premises registration and all animal ID.
21	Fairchild	Oppose	Clemens M Borntrager	premises	Religiously opposed to all premises registration and all animal ID.
22	Fairchild	Oppose	Clemens F Borntrager	premises	Religiously opposed to all premises registration and all animal ID.
23	Osseo	Oppose	Henry Wagler	premises	Religiously opposed to all premises registration and all animal ID.
24	Fairchild	Oppose	Dennis Borntrager	premises	Religiously opposed to all premises registration and all animal ID.
25	Augusta	Oppose	Vernon Bontrager	premises	Religiously opposed to all premises registration and all animal ID.
26	Fairchild	Oppose	Dan Borntrager	premises	Mailed in comment card
27	Fairchild	Oppose	Eli Borntrager	premises	Mailed in comment card
28	Fairchild	Oppose	Jacob Borntrager	premises	Forcing someone to take a premises registration is discrimination to his or her religion and is discrimination to our constitutional rights A better way to control disease would be to train your large farmers, controlled by the government, to use natural fertilizers, etc. Religiously opposed to all premises registration and all animal ID.
29	Granton	Oppose	Samuel & Ida Miller	premises	
30	Medford	Oppose	Roy A Borntrager	premises	Opposed to premises registration because it is taking away our constitutional rights.
31	Granton	Oppose	John Borntrager	premises	Religiously opposed to all premises registration and all animal ID.
32	Osseo	Oppose	Harvey R Shetler	premises	Religiously opposed to all premises registration and all animal ID.

33	Osseo	Oppose	Rudy & Barbara Shetter	premisses	Religiously opposed to all premises re and all animal ID.	ration
34	Osseo	Oppose	Samuel & Saloma Wagler	premisses	Religiously opposed to all premises re and all animal ID.	ration
35	Taylor	Oppose	Joseph Schwartz	premisses	Religiously opposed to all premises re and all animal ID.	ration
36	Fairchild	Oppose	Menno Borntrager	premisses	Religiously opposed to all premises re and all animal ID.	ration
37	Fairchild	Oppose	Dannie C Borntrager	premisses	Will not be able to comply with premisr registraton because we do not, not into computer. Religiously opposed to all p registration and all animal ID.	to get a nises
38	Fairchild	Oppose	Josey Gingerich	premisses	Mailed in comment card	
39	Osseo	Oppose	Harvey & Lizzie Stietzman	premisses	Religiously opposed to all premises re and all animal ID.	ration
40	Taylor	Oppose	Jacob & Polly Schwartz	premisses	Religiously opposed to all premises re and all animal ID.	ration
41	Fairchild	Oppose	Mervin Miller	premisses	Religiously opposed to all premises re and all animal ID.	ration
42	Taylor	Oppose	John & Lillie Borntrager	premisses	Religiously opposed to all premises re and all animal ID.	ration
43	Taylor	Oppose	Eli, Verba, & Martha Miller	premisses	Religiously opposed to all premises re and all animal ID.	ration
44	Fairchild	Oppose	Dennis Lehman	premisses	Religiously opposed to all premises re and all animal ID.	ration
45	Taylor	Oppose	Noah Schwartz	premisses	Religiously opposed to all premises re and all animal ID.	ration
46	Taylor	Oppose	John J. Schwartz	premisses	Religiously opposed to all premises re and all animal ID.	ration
47	Taylor	Oppose	Joe N. Schwartz	premisses	Religiously opposed to all premises re and all animal ID. Willing to give name buy and sell livestock.	ation en they
48	Taylor	Oppose	Chris C. and Sarah Borntrager	premisses	Religiously opposed to all premises re and all animal ID. Willing to give name buy and sell livestock.	ation en they
49	Taylor	Oppose	Moses Shetter	premisses	Religiously opposed to all premises re and all animal ID. Willing to give name buy and sell livestock.	ation en they
50	Granton	Oppose	John T. Borntrager	premisses	Religiously opposed to premises registri	on.

51	Taylor	Oppose	Henry H. Miller	premises	Sent in public hearing registration. Religiously opposed to all premises registration and all animal ID.
52	Taylor	Oppose	Abe N. Schwartz	premises	Religiously opposed to all premises registration and all animal ID.
53	Blair	Oppose	Roman A. Miller	premises	Religiously opposed to all premises registration and all animal ID.
54	Blair	Oppose	Eli H. Miller	premises	Religiously opposed to all premises registration and all animal ID.
55	Taylor	Oppose	Willie and Mary Bornrtreger	premises	Religiously opposed to all premises registration and all animal ID.
56	Taylor	Oppose	Samuel and Millie Stutzman	premises	Religiously opposed to all premises registration and all animal ID.
57	La Farge	Oppose	Mr. & Mrs. Amos Mast	premises	Religiously oppose premises registration - reference the premises article that appeared in Agri-View
58	Blanchardville	Oppose	Mark J. Kessenich & Linda E. Derrickson	premises	Oppose all premises registration including proposed rule change and all animal ID due to "spiritual beliefs" and "farming philosophy."
59	Bonduel	Oppose	Mike Druckrey	premises	Oppose premises rule change. Cites Wis. Statute 943.201 & Article I Section 18.
60	Taylor	Oppose	Jonas S. Stutzman	premises	Religiously opposed to all premises registration and all animal ID.
61	Fairchild	Oppose	Felty C. Bornrtreger	premises	Sent in public hearing card. Religiously opposed to all premises registration and all animal ID - premises rule changes included.
62	Augusta	Oppose	Dannie C Bornrtreger	premises	Religiously opposed to all premises registration and all animal ID - premises rule changes included.
63	Augusta	Oppose	Augusta Amish Community	premises	Religiously opposed to premises registration and animal ID.
64	Augusta	Oppose	Jacob R. Bornrtreger	premises	Religiously opposed to all premises registration and all animal ID.
65	Granton	Oppose	Felty H. & Joe F. Miller	premises	Religiously opposed to all premises registration and all animal ID.
66	Osseo	Oppose	Crist R. & Anna J. Shetler	premises	Religiously opposed to all premises registration and all animal ID.
67	Medford	Oppose	Rudy S. Schmucker	premises	Sent in public hearing card. Opposed to rule changes for premises regulations. Against constitutional rights.

68	Medford	Oppose	Simon Schmucker	premisses	Sent in public hearing card. Opposed to changes for premisses regulations. Against constitutional rights.	ulation
69	Augusta	Oppose	William I. Yoder	premisses	Religiously opposed to all premisses regulations and all animal ID.	ulation
70	Hixton	Oppose	Clemens C. Borntrager & Lydia Borntrager	premisses	Religiously opposed to all premisses regulations and all animal ID. Willing to give name buy and sell livestock.	ulation when they
71	Taylor	Oppose	Daniel A. & Ruth E. Borntrager	premisses	Religiously opposed to all premisses regulations and all animal ID. Willing to give name buy and sell livestock.	ulation when they
72	Taylor	Oppose	Henry H. & Sadie E. Shetler	premisses	Religiously opposed to all premisses regulations and all animal ID.	ulation
73	Osseo	Oppose	Jonas A. & Martha J. Hershberger	premisses	Religiously opposed to all premisses regulations and all animal ID. Willing to give name buy and sell livestock.	ulation when they
74	Taylor	Oppose	Harvey J. Shetler	premisses	Religiously opposed to all premisses regulations and all animal ID. Willing to give name buy and sell livestock.	ulation when they
75	Taylor	Oppose	Noah W. & Emma S. Shrock	premisses	Religiously opposed to all premisses regulations and all animal ID. Willing to give name buy and sell livestock.	ulation when they
76	Taylor	Oppose	Emanuel H. & Saloma I. Shetler	premisses	Religiously opposed to all premisses regulations and all animal ID. Willing to give name buy and sell livestock.	ulation when they
77	Fairchild	Oppose	Jacob Shrock	premisses	Sent in public hearing card. Opposes changes to premisses registration regulations - against constitution.	ulation when they
78	Fairchild	Oppose	Crist Shrock	premisses	Sent in public hearing card. Opposes changes to premisses registration regulations - against constitution.	ulation when they
79	Taylor	Oppose	Noah N. J. Schwartz	premisses	Religiously opposed to all premisses regulations and all animal ID. Willing to give name buy and sell livestock.	ulation when they
80	Augusta	Oppose	Jonas E. Bontrager	premisses	Sent in public hearing card. Religiously opposed to premisses registration.	ulation when they
81	Taylor	Oppose	Ervin A. & Annie J. Miller	premisses	Religiously opposed to all premisses regulations and all animal ID. Willing to give name buy and sell livestock.	ulation when they

82	Granton	Oppose	Harvey A. Borntrager	premises	Sent in public hearing card. Opposed to all premises registration and all animal ID. Says it is a "strike against our freedom and privacy."
83	Granton	Oppose	Rudy J. Miller	premises	Sent in public hearing card. Religiously opposed to all premises registration and all animal ID.
84	Blair	Oppose	Adam J. Miller	premises	Religiously opposed to all premises registration and all animal ID. Willing to give name when they buy and sell livestock.
85	Melrose	Oppose	Joni Miller	premises	Sent in public hearing card. Opposed to all premises registration and all animal ID.
86	Medford	Oppose	Ivan R. Miller	premises	Sent in public hearing card. Religiously opposed to all premises and animal ID.
87	Fairchild	Oppose	Abraham Borntrager	premises	Sent in public hearing card. Opposed to premises registration regulations. His objections are that premises registration "effects our belief and freedom."
88	Taylor	Oppose	Andy N. & Fannie H. Schwartz	premises	Religiously opposed to NAIS thereby they do not want to have their premises registered. Willing to give name when they buy and sell livestock.
89	Fairchild	Oppose	John W. Yoder	premises	Sent in public hearing card. Opposed to changes in premises registration regulations b/c it is against their constitutional rights of freedom to have these decisions made for them.
90	Taylor	Oppose	Levi Junior & Elizabeth Yoder	premises	Religiously opposed to all premises registration and all animal ID. Willing to give name when they buy and sell livestock.
91	Fairchild	Oppose	Emanuel W. Yoder	premises	Sent in public hearing card. Religiously opposed to all premises registration and all animal ID. "We have to stand against premises registration or we won't be able to stand against the next steps of NAIS."
92	Fairchild	Oppose	Ezra E. Miller	premises	Sent in public hearing card. Opposed to changes in premises registration regulations - "Does the constitution still stand?"
93	Fairchild	Oppose	Neil J. Gingerich	premises	Sent in public hearing card. Opposed to premises ID b/c he's "concerned about what else will come next."
94	Fairchild	Oppose	Simon J. Gingerich	premises	Sent in public hearing card. Opposed to premises ID b/c he's "concerned with what all else it could bring with it in the future."

95	Blair	Oppose	Jacob A. & Margaret J. Miller	premises	Religiously opposed to all premises registration and all animal ID. Willing to give name buy and sell livestock.	ation when they
96	Augusta	Oppose	John F. Borntrager	premises	Sent in public hearing card. Opposed in premises registration regulations.	changes
97	Black River Falls	Oppose	Ruben J. Miller	premises	Sent in public hearing card. Opposed in premises registration and all animal ID.	ill
98	Spring Valley	Oppose	Joan S. Carston 715-772-4808	premises	Religiously opposed to all premises registration and all animal ID. Also opposed to pre and animal ID b/c she believes it harms industry, infringes on the right to privacy, no protection from misuse of info or technology or criminal activity, does not seriously address animal disease issues, and the RFID is b/c it can be too easily tampered with.	ation es ID ur Ag. offers ology or ss ot safe
99	Taylor	Oppose	Rudy H. & Elizabeth D. Shetler	premises	Religiously opposed to all premises registration and all animal ID.	ation
100	Fairchild	Oppose	Rudy W. Borntrager	premises	Sent in public hearing card. Opposed in premises registration regulations.	changes
101	Fairchild	Oppose	Daniel W. Borntrager	premises	Sent in public hearing card. Opposed in premises registration regulations.	changes
102	Fairchild	Oppose	Phineas A. Borntrager	premises	Sent in public hearing card. Religiously to all premises registration and all animal ID.	posed ID.
103	Osseo	Oppose	Jonas Wagler	premises	Religiously opposed to having their premises registered. Willing to give name when buy and sell livestock.	ses y buy
104	Arcadia	Oppose	Robert Scharlau	Premises	Opposed to forced registration of livestock as NAIS	and
105	pmjrcq@charter.net	Oppose	Mary Jane Allen	premises	Opposes premises registration and animal ID. Believes that these IDs are "needless" and will punish the small farmer.	ID. s" that
106	Shorewood	Oppose	Cynthia Carlson	premises	Opposed to all premises registration and animal ID. Says that there has been no basis for claims of improved disease control. "Infringes on our property rights." "NAIS will drive many small and medium-size farmers and ranchers out of business."	ill ientific rol. ill drive
107	Wauwatosa	Oppose	Shannon Doberstein	premises	Opposed to proposed premises registration change, NAIS, and premises registration	in rule tself.
108	Milwaukee	Oppose	Dr. Larry L. Duetsch	premises	Opposed to proposed premises registration change as well as NAIS.	in rule

109	Iron River	Oppose	Christy Ehlers	premises	Opposed to proposed premises registration rule change, NAIS, and premises registration itself.
110	phyllis@terra.com.net	Oppose	Phyllis Hasbrouck	premises	Opposed to proposed premises registration rule change as well as NAIS. "people's right to raise animals without chips in them."
111	Windsor	Oppose	Jean Schneider	premises	Opposed to proposed premises registration rule change, NAIS, and premises registration itself.
112	Wauwatosa	Oppose	Angela Johnson	premises	Opposed to proposed premises registration rule change, NAIS, and premises registration itself.
113	Park Falls	Oppose	Paul-Martin Griepentrog	premises	Opposed to proposed premises registration rule change which allows DATCP to register his premises w/o consent.
114	terrikahn@sbcglobal.net	Oppose	Terri Kahn	premises	Opposed to premises ID and Animal ID.
115	irkish@charter.net	Oppose	Jason & Robin Kish	premises	Opposed to premises ID and Animal ID.
116	Viroqua	Oppose	Dan Peper	premises	Opposed to NAIS.
117	Fitchburg	Oppose	Rosanne Lindsay	premises	Opposed to NAIS - attack on personal privacy, property rights, and religious freedom & diminished local food security. NAIS will eliminate the small farmer thru costly (time and \$) requirements like RFID chips. Worried about health risks of RFID chips. Wants factory farmers to test their animals for Mad Cow disease like other countries do and like small WI farmers are in favor of doing.
118	Madison	Oppose	Sue Martin	premises	Opposed to all premises registration and all animal ID. Also opposed to the idea of having to renew premises after it's been registered in the first place.
119	Madison	Oppose	Douglas Martin	premises	Opposed to all premises registration and all animal ID. Opposed to proposed premises registration rule changes.
120	livabelleacres@yahoo.com	Oppose	Rosa Mooney	premises	Opposed to the proposed premises registration rule change which allows DATCP to register premises.
121	Price County	Oppose	Vern Moore	premises	Opposed to all premises registration and animal ID.
122	chirho3@pnqusa.net	Oppose	Bill Neu	premises	Asked why NAIS program is signing farmers up against their wishes, why a voluntary USDA program mutated to a mandatory program at the state level.
123	Monona	Oppose	Roxanne Robinson	premises	Opposed to all premises registration and all animal ID.

124	Spring Valley	Oppose	Joe Schmitt	premises	Opposed to the proposed premises rule change which allows DATCP to register premises and opposed to premises registration itself.	registration
125	Pulaski	Oppose	Marian Schmitz	premises	Opposed to all premises registration & animal ID.	all
126	sandhillcountry@yahoo.com	Oppose	Gerald Schubert	premises	Opposed to the proposed premises rule change which allows DATCP to register premises.	registration
127	jerry.stieling@fitchburg.wi.us	Oppose	Jerry Stieling	premises	Opposed to the forced animal ID program.	1.
128	Rib Lake	Oppose	Traci Tappe	premises	Opposed to proposed premises registration change, NAIS, and premises registration.	on rule
129	Non WI Resident	Oppose	Bes2horse@hotmail	Premises	Opposed as violation of my rights	itself.
130			DATCP	Premises	Add the registrants county under 17.0 information currently required)
131	Melrose	Oppose	Samuel J. Yoder	Premises	Opposed to all premises registration & ID for religious reasons.	animal
132	Fitchburg	Oppose	Terry Carpenter & Rick Bucheger	premises & meat testing	Opposed to NAIS - attack on personal property rights, and religious freedom diminished local food security. NAIS with the small farmer thru costly (time and money) requirements like RFID chips. Worried about health risks of RFID chips. Wants fact to test their animals for Mad Cow disease. Other countries do and like small WI farmers in favor of doing.	vacancy, eliminate out farmers like cars are
133	Curtiss	Oppose	Vernon Mullet	premises & trucker, dealer, market	Opposes proposed changes to premises regulations as well as trucker, dealer, & regulations.	market
134	Augusta	Oppose	Adin & Emma Gingerich	premises & trucker, dealer, market	Sent in public hearing card. Opposed to changes for farm-raised deer, premises trucker, dealer, or market regulations.	file and
135	Fairchild	Oppose	Jake E. Gingerich	premises & trucker, dealer, market	Sent in public hearing card. Religiously opposed to all premises registration and associated regulations.	proposed

136	Augusta	Oppose	Joe E. Bontrager	premises & trucker, dealer, market	Sent in public hearing card. Opposed changes to premises regulations and changes to trucker, dealer, or market regulations.
137	Augusta	Oppose	Eli J. Bontrager	premises & trucker, dealer, market	Sent in public hearing card. Opposed to premises registration and NAIS b/c it will hinder their way of life. Also opposed to rule changes for trucker, dealer, or market regulations.
138	Medford	Oppose	Daniel M. Miller	premises & trucker, dealer, market	Sent in public hearing card. Opposed to premises ID and NAIS b/c these ID systems "would no longer be trusting in a higher hand to protect us." Also opposed to rule changes for trucker, dealer, or market regulations.
139	Mondovi	Oppose	David M. Swarey	premises & trucker, dealer, market	Sent in public hearing card. Religiously opposed to premises registration. Also opposed to trucker, dealer, or market regulations.
140	Augusta	Oppose	Jake F. Borntrager	premises & trucker, dealer, market	Sent in public hearing card. Opposed to changes in premises registration regulations as well as changes to trucker, dealer, or market regulations.
141	Augusta	Oppose	Eddie D. Borntrager	premises & trucker, dealer, market	Sent in public hearing card. Opposed to changes in premises registration regulations as well as changes to trucker, dealer, or market regulations.
142	Augusta	Oppose	Rudy E. Gingerich	premises & trucker, dealer, market	Sent in public hearing card. Religiously opposed to all premises and animal ID. Also opposed to proposed changes to trucker, dealer, or market regulations.
143	Augusta	Oppose	Eli D. Gingerich	premises & trucker, dealer, market	Sent in public hearing card. Opposed to changes in premises registration regulations as well as changes to trucker, dealer, or market regulations.
144	Augusta	Oppose	Sam W. Yoder	premises & trucker, dealer, market	Sent in public hearing card. Religiously opposed to all premises and animal ID. Also opposed to proposed changes to trucker, dealer, or market regulations.

145	Augusta	Oppose	Melvin E. Bontrager	premisses & trucker, dealer, market	Sent in public hearing card. Opposed in premisses registration regulations as changes to trucker, dealer, or market	changes all as regulations.
146	Fairchild	Oppose	William D. Bontrager	premisses & trucker, dealer, market	Sent in public hearing card. Opposed in premisses registration regulations as changes to trucker, dealer, or market	changes all as regulations.
147	Augusta	Oppose	David R. Gingerich	premisses & trucker, dealer, market	Sent in public hearing card. Religious to all premisses and animal ID. Also of proposed changes to trucker, dealer, or regulations.	pposed sed to market
148	Augusta	Oppose	Raymond R. Gingerich	premisses & trucker, dealer, market	Sent in public hearing card. Opposed in premisses registration regulations as changes to trucker, dealer, or market	changes all as regulations.
149	Mondovi	Oppose	John B. Stoltzfus	premisses & trucker, dealer, market	Sent in public hearing card. Religious to all premisses and animal ID. Also of proposed changes to trucker, dealer, or regulations.	pposed sed to market
150	Black River Falls	Oppose	Ammon S. Miller	premisses & trucker, dealer, market	Sent in public hearing card. Opposed premisses registration and animal ID. C rule changes for trucker, dealer, or market regulations - afraid that if rule this rule will lead to "the number and the beast	all osed to at anged it
151	Fairchild	Oppose	William Yoder	Trucker Dealer Market - premisses	Religiously opposed to all premisses re and all animal ID.	tration
152	Fairchild	Oppose	David W. Yoder	Trucker Dealer Market - premisses	Mailed in public hearing registration. F opposed to changes premisses registra regulations. Also opposed to changes dealer, or market regulations.	giously n trucker,
153	Ottawa	Oppose	Mary Wilke	USDA Censes	"They are closing FSA offices so there for NAIS, which we as horse owners d support." Wilke also says that they jus USDA censes due Feb. 4th but don't r info they are required to provide b/c ta due until April 15th. Apparently they ar censes, against unknown ppl calling a	funding ot ceived e the s are not against

					identifying themselves as from the USDA.	
1	Blue Mounds	Support	John A. & Katie S. Field	premises	Support all premises registration and related rule changes.	
2	Verona	Support	AgSource Cooperative Services	premises	Supports mandatory premises registration and promotes both premises and animal ID.	
3	New Holstein	Support	Gold Star Farms - Deb Reinhart	premises	Supports the proposed "rules related to animal health and disease control." Supports the rule change to make premises registration every 3 years. Also supports getting all premises registered.	
	Madison	Neither	DATCP	Farm-raised Deer	Deer that escape from a registered farm-raised deer premises need to be captured and re-enter the herd within a reasonable time frame to contain exposure to an untested wild deer population.	
		Neither	Dr. Shelby Molina	Farm-raised Deer	Allowing 10 days after death for sample collection will provide time for deterioration of the sample.	
		Modifications	Laurie Prasnicki	Farm Raised Deer	See Comments under Bill Vyvyan, below.	

	Eau Claire	Opposed	Bill Vyvyan -- WOW/WCDEFA	Deer Farm	<p>The following changes in rule are unacceptable:</p> <ul style="list-style-type: none"> • Changing testing age from 16 months to 8 months. • Having a veterinarian do census would cost \$1000's. • Changing the TB testing requirements for movement from 360 days to 90 days movement. <p>The 8% rule that is currently in rule is stringent and will put good deer farmers out of business.</p> <p>Current rule that calls for 30' for medication separation is acceptable. It should not be changed.</p> <p>For decomposing samples, the lymph node should be the primary specimen instead of the obex.</p> <p>Suggest that the Western Blot be used on all samples sent in that are not testable for HC.</p>
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COMMENTS PROVIDED AT HEARINGS

Registered	name/org	Topic	Position	Testify
			Opposes the requirement for an animal trucker to record the premises registration - if available - of the destination.	
1	Dave Mathes - WILDA	Premises Code	Not against taking the test, truckers, markets and dealers should take the test every 5 years.	
2	Jeff Pausma	Premises & Truck, Market, Dealer changes	Goat and sheep Id not issue if dealer and markets could apply their own ID.	Y
3	John Maedke	Premises	Federal livestock markets should be required to announce the origin of the livestock prior to the sale on after.	Y
4	Deb Gates	Premises	Against it being a law.	Y
5	Robert M. Sebesta	Premises	Against DATCP being able to register a premises without the consent of the owner. Question confidentiality of the premises number. PETA could identify premises.	Y
6	Maureen Dickinson - Amish communities of Taylor, Augusta, Granton, Medford, Franklin, Gilmanton	Premises	Meeting time and advertising poor. As a group we do not have the technology to comply with the 48 hour trace back system this calls for. Current tracking ability and response time adequate and costs much less. Concern the NAIS will be adapted to this program and they are religiously very opposed to it.	Y
7	Sam Denzinger	Premises	It is a USDA program for exports. Totally opposed to what is going on here	Y
8	Brian Voelker	Premises	Opposed - feel he was strong armed into becoming registered. Doesn't feel that the state is capable of keeping information confidential and doesn't want to be a part of this.	Y
9	Steve Pechacek	Premises	NAIS is unconstitutional and therefore premises registration	Y

10	Opposed	Kelly Burfeind	Premises	You cannot talk about premises ID with talking about NAIS. The USDA has 70% compliance is acceptable why is that not acceptable to DATCP. Representative Gronemus has indicated this will cost the producer money.	Y
11	Opposed	Mathew Aarnot	Premises	Oppose the move to register a premises without the owner's consent.	Y
12	Opposed	J.C Cordell	Premises	Oppose the move to register a premises without the owner's consent.	Y
13	Opposed	Robin Oliver	Premises	opposed to whole identification system	N - r
14	Opposed changes to trucker, market, dealer, or market regulations	Tod Fleming - Equity Livestock	Premises	Opposes the requirement for an animal trucker to record the premises registration - if available - of the destination.	Y
15	Opposed to NAIS	John Schuler	Premises	Opposed to premises registration as it is violation of rights	Y
16	Opposed RFID	Dave Hendrickson - Libertarian Party Chair	Premises	Opposes animal ID, RFID and premises registration	Y
17	Opposed to NAIS	Mark Brothen	Premises	Opposes NAIS and premises registration.	Y
18	Oppose	John Peck Family Farm Defenders	Premises	State should not be allowed to register people against their will - this is unconstitutional.	Y
19	Oppose	Bill Mitchell	Premises	Supports COOL - premises registration violates right to privacy -	Y
20	Oppose	James Christensen	Premises	Why does it have to be renewed if it stays with the property?	Y
21	Oppose	Andrew Mastrocola	Premises	Violates the supremacy of individual rights	Y
22	Oppose	Dona Campos	premises	Against signing individuals up against their will. Concerned that they were told that the premises number would be confidential but it is not. Feels that NAIS is a conspiracy b/t government, pharmaceuticals and RFID tag companies.	Y
23	Opposed	Robert Popple	Poultry	Rules are not geared to the hobbyist, too restrictive	Y
24	Neither	Pat Lacey	Poultry	ATCP 10.40(6) (c) and (d) Appear to not allow NPIP flocks to be commingled with tested birds that are not in the NPIP program. This appears to be an oversight and should be corrected.	N - C

25	Support w/ amendment	Byron Kershaw	Poultry	ATCP 10.40(6) (c) and (d) Appear to not allow NPIP flocks to be commingled with tested birds that are not in the NPIP program. This appears to be an oversight and should be corrected.	No-Comments
26	Oppose	Al Doyle	NAIS	The NAIS program is the kind of Orwellian idea that is absolutely repugnant. We need far less government meddling in farming, not more. Opposes DATCP ability to register premises	Y
27	Opposed	Randy Palmer	NAIS		N - registered
28	Support w/ amendment	Teri Raffel - Wisconsin Veterinary Technician Association	Johne's Sample Collection	Requests that the supervision of the DHIA tech would be a greater level than supervision of Certified Veterinary Technicians (CVT). DHIA techs should have to be supervised by the DVM, with the DVM on the premises	Y
29	Neither	Dr. Robert K Smith	fish health	Info only.	N - registered
30	Support w/ amendment	Joel Espe	Farm Raised Deer	Support 8% rule a presented by WOW and WCDEFA. Believed farm raised deer industry is an over regulated industry. Changing testing age from 16 months to 8 months is not acceptable. Having a veterinarian do census verification would cost \$1000's. This is unacceptable Extending the Brucellosis testing requirements for certified herds from 2 to 3 years is a huge step in making the Brucellosis rules consistent with the TB requirement to become a certified herd be reduced from 3 whole herd tests to 2 whole herd tests. Changing the TB testing requirements for movement from 360 days to 90 days prior to movement is unacceptable. Changing the TB testing requirements for movement from 360 days to 90 days prior to movement is unacceptable.	Y
31	Opposed	Bill Vyvyan - WOW/WCDEFA	Deer Farms	The 8% rule that is currently in rule is too stringent and will put good deer farmers	Y

	<p>out of business. To make this rule better it is recommended that DATCP recognize samples taken at hunting preserve as valid for the breeder location that sold to the hunting preserve. Or allow the option for the farmer to 'replace' the untestable animal be putting down another animal and having it tested.</p> <p>Under current rule 30' separation is acceptable for 'medical separation. We see no reason not to continue with this requirement as an approved means to separate the two herds.</p> <p>When we refer to decomposing samples, it would be helpful to have the lymph node declared the primary specimen instead of the obex.</p> <p>We suggest that all samples we send in that are not testable by IHC testing be automatically tested using the Western Blot. Additional expense involved for the Western Blot test would be passed on to the farm.</p>			
	<p>We suggest that all samples we send in that are not testable by IHC testing be automatically tested using the Western Blot. Additional expense involved for the Western Blot test would be passed on to the farm.</p>			
	<p>Rule should address dead fish too.</p> <p>Rules are more restrictive to fish farms than wild harvest bait dealers.</p> <p>Type 1 and Type 2 criteria should be establish to help clear up Bait dealer v. Distributor confusion. A retail license should be considered.</p> <p>Fish farm registration should be extended to every 3 years and premises registration of multiple ponds needs to be simplified</p>		<p>Tim Gollon - Gollon bait and Fish Farm</p>	<p>Support w/ amendment</p>
32		<p>AQ - VHS testing requirements</p>		

				There is no acceptable protocol that can be used for testing fry, requests that testing of captive brood stock be recognized for certifying the health of sac fry.		
33	Support w/ amendment	James Heid	AQ - VHS testing requirements	Requests that there be some recognition of medical separation at commercial facility. This would provide a management option for commercial aquaculturist that would limit the expense of VHS testing requirements.	Y	
34	Opposed	Celena A Verdegan	All	Individuals should have the option for an exemption for the program hobby farms and families that only a few animals for their own personal use.	Y	
35	Opposed	Daniel C.M. Borntrreger	All			N - registered
36	Opposed	Clemens W Borntrreger	All			N - registered
37	Opposed	Damen DePriest	All			N - registered
38	Opposed	Chuck Serier	All			N - registered
39	Opposed	Joe Schmitt	All			N - registered
40	Support	Deb Reinhardt	All	Opposed to all registrations Opposed to all registrations Premises ID works, making it easier to register premises protects us all, farmers who do not register delay response to and process in a animal disease	N	
41	Oppose	Tania Wadzinski	All	All record requirements for poultry and horse shows are too restrictive. Against DATCP registering a premises without the consent of the owner.	Y	