



Texas and Southwestern Cattle Raisers Association

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*The*  
**Cattleman**

 CATTLE RAISERS  
INSURANCE

June 10, 2018

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

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

**RE: Texas Animal Health Commission proposal to amend Texas Administrative Code, Title 4, Part 2, Chapter 51, §51.8 relating to entry requirements for cattle.**

The Texas and Southwestern Cattle Raisers Association (TSCRA) appreciates the opportunity to comment on the Texas Animal Health Commission (TAHC) proposal to amend §51.8 of the Texas Administrative Code relating to entry requirements for cattle.

TSCRA is a 141-year-old trade association and is the largest and oldest livestock organization based in Texas. TSCRA has more than 17,500 beef cattle operations, ranching families and businesses as members. These members represent approximately 55,000 individuals directly involved in ranching and beef production who manage 4 million head of cattle on 76 million acres of range and pasture land primarily in Texas and Oklahoma, but throughout the Southwest.

Trichomoniasis is a venereal disease of cattle that results in infertility, early term abortions, and extended calving seasons. There is no effective treatment for infected bulls leaving slaughter as the only prudent option in preventing the spread of this disease. If present in a breeding operation, this disease causes significant economic loss to the cattle owner through decreased calving production and the possible loss of valuable genetics.

TSCRA supports the allowance of out-of-state breeding bulls over 12 months of age to enter Texas without a certificate of veterinary inspection (CVI) that includes negative Trichomoniasis test results so long as:

- Bulls are shipped directly from a premises of origin to a federally approved livestock market;
- The federally approved livestock market isolates bulls from female cattle at all times; and
- The bulls are tested in accordance with §38.2 of the Texas Administrative Code once in Texas.

TSCRA also thanks TAHC for working with the Texas cattle industry to develop common sense regulations that mitigate the effects Trichomoniasis has on ranchers and cattle producers.

If you have any questions regarding these comments or TSCRA's position on other Trichomoniasis regulations, please contact Kaleb McLaurin at 512.469.0171 or [kmclaurin@tscra.org](mailto:kmclaurin@tscra.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Robert E. McKnight, Jr.", written over a white background.

Robert E. McKnight, Jr.  
President