

July 15, 2009

Re: 2010 Agriculture Appropriations bill and the National Animal Identification System

Dear Senators:

The undersigned organizations urge you to support an amendment eliminating funding for the National Animal Identification System (NAIS) from the 2010 Agriculture Appropriations bill. Contrary to its stated purposes, NAIS will not address animal disease or food safety problems. Instead, NAIS imposes high costs and paperwork burdens on family farmers and creates incentives for CAFOs and vertically integrated systems. This burdensome, ill-conceived, and badly implemented program should not receive any federal funding.

USDA's plans for NAIS describe a far-reaching three-step program that calls for every person who owns even one livestock or poultry animal to register their property, tag each animal when it leaves the property it was born on, and report a long list of movements to a database within 24 hours. The provisions would apply whether or not that animal is used for commercial purposes. NAIS would directly impact millions of animal owners. Group or lot identification would only be allowed where animals are managed as a group from birth to death and never commingled with animals outside of their production system. In practice, group identification would apply mainly, if not entirely, to confined animal feeding operations (CAFOs) and vertically integrated operations.

NAIS is fundamentally flawed for multiple reasons:

- 1) No analysis or quantification of the alleged benefits. USDA has made unsupported assertions that our country needs 48-hour traceback of all animal movements for disease control. Yet USDA has failed to provide any scientific basis, including risk analysis or scientific review of existing programs, to support this claim. USDA has also asserted that NAIS would provide 48-hour traceback, but has failed to address the many technological and practical barriers. Existing disease control programs, combined with measures such as brand registries and normal private record-keeping, provide cost-effective traceback. A new and costly program such as NAIS is unnecessary and potentially counterproductive.
- 2) High costs. The costs of complying with NAIS will be unreasonably burdensome for small farmers and many other animal owners. The costs of NAIS go far beyond the tag itself, and include: premises registration database creation and updates; tags and related equipment, such as readers, computers, and software; 24-hour reporting requirements, imposing extensive paperwork burdens; labor for every stage of the program; stress on the animals; qualitative costs, from loss of religious freedoms, privacy, and trust in government; and enforcement.

USDA's cost-benefit analysis acknowledges that the costs to small producers could be two to three times higher than the costs for large producers. Moreover, the study contains numerous gaps, false assumptions, and misleading tactics that severely underestimate the true costs of NAIS. The study manipulates the categories to disguise the costs to small farmers, homesteaders and other individuals with a few animals; incorrectly discounts costs for

technological infrastructure; makes assumptions about the use of group identification that contradict the USDA and working group documents; does not address that massive underestimation of the number of “premises” affected, therefore underestimating the cost of the program; and improperly compares the benefits that will accrue to a handful of corporations to the costs that will be borne by millions of individuals.

- 3) No food safety benefits. NAIS will not prevent foodborne illnesses from *e. coli* or salmonella, because the contamination occurs at the slaughterhouse, while NAIS tracking ends at the time of slaughter. Thus, NAIS will neither prevent the contamination nor increase the government’s ability to track contaminated meat back to its source. In addition, NAIS will hurt efforts to develop safer, decentralized local food systems.
- 4) Unfair burdens placed on family farms and sustainable livestock operations: In addition to the costs, NAIS would impose significant reporting and paperwork burdens on small farms. In addition, sustainable livestock operations, which manage animals on pasture, would face higher rates of tag losses than confinement operations due to animals getting their tags caught on brush or fences. NAIS essentially creates incentives for CAFOs, with the accompanying social and environmental concerns.
- 5) Rewards vertical integration and consolidation: USDA’s guidance documents provide that “animals that typically move through the production chain as a group of animals of the same species can be identified by Group/Lot Identification Numbers (GINs), rather than individual numbers.” In practice, this means that companies who maintain ownership of the animals throughout their lives – as is done in vertically integrated swine and poultry CAFOs – will be relieved of most of the costs and paperwork burdens of NAIS.
- 6) Ethical concerns: USDA’s working groups were drawn from groups established by the National Institute for Animal Agriculture. Members of the working groups included many companies who stand to profit directly from implementation of NAIS, such as tag manufacturers and database management companies. Until the recent listening sessions, the USDA provided for little-to-no involvement of average animal owners who will be directly impacted by NAIS. Our unofficial estimate is that more than 90% of the people who have attended the meetings have spoken against NAIS. The clear message was to eliminate the program.
- 7) Alternatives: Using USDA’s resources on alternative approaches would provide significantly greater benefits for both animal health and food safety. Measures such as increased inspections of imports, more rigorous enforcement of regulations on large slaughterhouses, and focusing on high-risk CAFOs are clear areas for improvement that would be consistent with both good science and good economics.

For these reasons, we strongly urge you to support an amendment to eliminate funding for NAIS in the 2010 Appropriations bill. We thank you for your consideration.

Sincerely,

Acres
 Adopt a Family Farm
 Alabama Sustainable Agriculture Network
 American Goat Society
 American Grassfed Association
 American Indian Horse Registry
 American Policy Center
 Arkansas Animal Producers Association
 California Farmers Union
 Carolina Farm Stewardship
 Carriage Operators of North America
 Cattlemen's Texas Longhorn Registry
 Citizens for Private Property Rights (MO)
 Colorado Independent Cattlegrowers Association
 Community Farm Alliance (KY)
 Cornucopia Institute
 Dakota Resource Council
 Dakota Rural Action
 Davis Mountain Trans Pecos Heritage Association
 (TX)
 Downsize DC
Edible Austin
 Edible San Marcos (TX)
 Empire State Family Farm Alliance (NY)
 Equus Survival Trust
 Fair Food Matters (MI)
 Farm Aid
 Farm and Ranch Freedom Alliance
 Farm-to-Consumer Legal Defense Fund
 Food and Water Watch
 Freedom 21
 Grassroots International
 Innovative Farmers of Ohio
 International Texas Longhorn Association
 Iowa Citizens for Community Improvement
 Jackson County Local Action Coalition (OR)
 Land Stewardship Project (MN)
 Maine Alternative Agriculture Association
 Marshall County Citizens for Property Rights (AL)
 Massachusetts Smallholders Alliance
 Michigan Farmers Union
 Michigan Land Trustees
 Michigan Organic Food and Farm Alliance
 Mississippi Livestock Markets Association
 Missouri Rural Crisis Center
 Missourians for Local Control
 Montana Cattlemen's Association
 Montana Farmers Union
 National Association of Farm Animal Welfare
 National Family Farm Coalition
 National Latino Farmers and Ranchers Trade
 Association
 Nebraska Sustainable Agriculture Society
 North Carolina Contract Poultry Growers
 Association
 Northeast Organic Farming Association –
 Massachusetts
 Northeast Organic Farming Association – New
 Hampshire
 Northeast Organic Farming Association – New
 York
 Northeast Organic Farming Association - Vermont
 Northeast Organic Farming Association Interstate
 Council
 Northern Illinois Draft Horse and Mule Association
 Northern New Mexico Stockman's Association
 Northern Plains Resource Council (MT)
 Oregon Livestock Producers Association
 Organic Consumers Association
 Organization for Competitive Markets
 Ozarks Property Rights Congress (MO)
 Paragon Foundation
 Powder River Basin Resource Council (WY)
 Property Rights Congress
 R-CALF USA
 Rocky Mountain Farmers Union
 Secure Arkansas
Small Farmer's Journal
 Small Farms Conservancy
 South Dakota Stockgrowers Association
 Sovereignty International
 Sustainable Food Center (TX)
 Texas Eagle Forum
 Texas Farmers Union
 Texas Landowners Council
 Texas Organic Farmers and Gardeners Association
 Tuscaloosa Property Rights Alliance (AL)
 Virginia Land Rights Coalition
 Western Organization of Resource Councils
 Weston A Price Foundation
 Wintergarden Sustainable Agriculture Coalition
 (TX)

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