

U.S. Senate Committee on Appropriations
Room S-131, The Capitol
Washington, DC 20510

July 15, 2008

Dear Members of the Senate Appropriations Committee:

We, the undersigned organizations, urge you to keep appropriations for the School Lunch Program separate from the National Animal Identification System (NAIS). The reason for this letter is that the House Agriculture Appropriations Subcommittee included a provision that would require USDA to purchase for the School Lunch Program meat products that are derived from farms (premises) registered with the NAIS. This provision undermines the School Lunch Program and promotes a flawed policy.

The House subcommittee provided two reasons for this including provision. The first reason is to address public health concerns, specifically related to meat recalls. The second reason is to increase participation in the NAIS. Both reasons are fundamentally flawed.

NAIS is a 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 its birthplace, and report a long list of movements to a database within 24 hours. The listed species include chickens, horses, cows, sheep, goats, pigs, llamas, alpacas, elk, deer, bison, turkeys, and more, whether or not the animal is used for food. 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 confinement operations (CAFOs) and vertically integrated operations. The stated goal of NAIS is to provide 48-hour traceback of all live animal movements.

NAIS will harm independent farmers and increase the consolidation of our food supply into the hands of a few large corporations. The school lunch provision in particular will favor the most vertically integrated farms that can easily prove that all their meat is from a NAIS-registered farm, as well as confinement operations that will be able to use group identification under NAIS. By creating incentives for CAFOs, the provision will harm both the public health and the environment.¹ Americans who are increasingly seeking out local and sustainable foods will find their ability to obtain these foods limited.

Linking NAIS to the School Lunch Program will also harm the growing movement of farm-to-school programs, while benefiting only large-scale, confinement operations where food safety problems are more likely to occur. The farm-to-school programs help improve children's nutrition while providing family farms with a reliable market. They also promote the local economy and environmentally sustainable agriculture, and re-connect children with the source of their food. But many of the small, local farmers who are participating in these programs, or who want to participate, are opposed to NAIS. Whether for philosophical reasons or the costs and burdens imposed by NAIS, these farmers are unlikely to be able to comply with the provision in the appropriations bill.

¹ See Doug Gurian Sherman, CAFOs Uncovered: The Untold Costs of Confined Animal Feeding Operations, Union of Concerned Scientists (April 2008).

In the recent Hallmark/Westland beef recall, the fault lies with the packing plant for violating existing regulations and with the USDA for failing to properly inspect the plant. “Downer” cows were slaughtered and the meat then provided to the School Lunch Program. In the video from the Humane Society, every time there was a clear shot of a cow’s left ear, one can see a tag.² Changing the type of tag to an NAIS electronic tag would do nothing to address the problem.

For these reasons, we strongly urge you to not include any provision linking the School Lunch Program to NAIS. Additional background information on why NAIS is a flawed system to address food safety is attached.

We thank you for your consideration.

Sincerely,

Adopt a Farm Family
America Raw Milk Producers Pricing Association
American Grassfed Association
American Land Foundation
American Policy Center
Arkansas Animal Producers Association
California Dairy Campaign
California Farmers Union
Carriage Operators of North America
Catholic Charities, Diocese of Sioux City, IA
Cattlemen’s Texas Longhorn Registry
Center for Rural Affairs
Chez Panisse Foundation (CA)
Citizens Action Coalition of Indiana
Citizens for Private Property Rights - Missouri
Colorado Independent Cattlegrowers Association
Community Food Security Coalition
Cornucopia Institute
Dakota Rural Action (SD)
Davis Mountain Trans Pecos Heritage Association (TX)
Diocese of Jefferson City, MO
Downsize DC
Empire State Family Farm Alliance (NY)
Environmental Conservation Organization
Equus Survival Trust
Fair Food Matters (MI)
Family Farm Defenders
Farm and Ranch Freedom Alliance
Farm to Consumer Legal Defense Fund
Federation of Southern Cooperatives
Focus on Agriculture in Rural Maine Schools (FARMS)
Food for Maine's Future
Grassroots International
Illinois Independent Consumers and Farmers Ass'n

² <http://www.youtube.com/watch?v=kaM7Hpu47FY>

Innovative Farmers of Ohio
International Texas Longhorn Association
Iowa Citizens for Community Improvement
Liberty Matters
Maine Alternative Agriculture Association
Maine Organic Farmers and Gardeners Association
Massachusetts Small Holders Alliance
Mesa County Cattlemen's Association (CO)
Michigan Land Trustees
Missouri Farmers Union
Missouri Rural Crisis Center
Missourians for Local Control
Montana Cattlemen's Association
Montana Farmers Union
National Family Farm Coalition
National Farmers Organization
National Latino Farmers and Ranchers Trade Association
North Carolina Contract Poultry Growers Association
Northeast Organic Farming Association Interstate Council
Northeast Organic Farming Association of Vermont
Northeast Organic Farming Association/ Massachusetts Chapter
Northern Plains Resource Council (MT)
Oregon Consumers and Farmers Association
Organic Consumers Association
Organization for Competitive Markets
Ozarks Property Rights Congress--Missouri
Paragon Foundation
Peak to Plains Alliance (CO)
PFUSA Grange #835 (CA)
Powder River Basin Resource Council (WY)
Progressive Agriculture Organization (PA)
Property Rights Congress
Regional Farm and Food Project (NY)
Rocky Mountain Farmers Union
Rural Vermont
Society for Preservation of Poultry Antiquities
South Dakota Stockgrowers Association
Sovereignty International
Sustainable Food Center (TX)
Texas Eagle Forum
Texas Landowners Council
Tuscaloosa Property Rights Alliance (AL)
Western Organization of Resource Councils
Weston A Price Foundation
White Earth Land Recovery Project (MN)
Whole Lunches (MI)
Wintergarden Sustainable Agriculture Coalition (TX)

Why the National Animal Identification System Will Not Address Food Safety

Livestock producers, who bear the burden under NAIS, are not the source of most food-borne illnesses. These illnesses are from bacteria such as salmonella, e. coli, and campylobacter, or the Norwalk viruses, which contaminate food due to poor practices at slaughterhouses or in food handling.¹ The NAIS would do nothing to prevent these problems from occurring. Moreover, because the tracking would end at the time of slaughter, the NAIS would not improve the government's ability to trace contaminated meats once they leave the slaughterhouse and enter the food chain.

NAIS is also not an effective control for BSE, or "Mad Cow Disease," even though it affects live animals. BSE is believed to be caused by feeding infected animal material to cattle. So the key to addressing it is prevention through a strong feed ban. The second key to addressing Mad Cow disease is testing all or a significant percentage of the animals that enter the food supply, as is done in Japan and Europe. The USDA currently tests only about one out of every thousand slaughtered cattle,² and has opposed increased testing, whether government or private.

Although Congress has devoted over \$100 million in appropriations towards the program since 2004, Congress has never mandated NAIS, nor even mentioned NAIS in authorizing legislation. NAIS will impact millions of animal owners, including people raising food for themselves, hobby farmers, recreational horse owners, and those who own livestock as pets. Congress needs to hold hearings with a full and open debate on the validity of NAIS, not implement it via the back door through appropriations.

The concept of tracking every movement of every livestock animal in massive databases may sound impressive, but it is not founded in sound science, economics, or practicality. USDA has not provided any studies showing why 48-hour traceback is "optimal" nor why 100% of animals must be included. The susceptibility of animals to disease and the likelihood of transmission differ greatly depending on the species of animal, the exact disease, and the conditions under which the animals are kept. Therefore, it is obvious that a "one size fits all" solution cannot be based on science. USDA as yet has failed to complete a cost-benefit analysis, despite four years of implementing the program. Moreover, the experience of Australia, the only other country to implement mandatory electronic tracking of cattle so far, indicates that the databases are unwieldy and unworkable. The GAO's 2005 report on agroterrorism and livestock disease made it clear that parts of the U.S. animal health system needed improvement, but did not identify a need for increased tracking of live animals.³

¹ See Centers for Disease Control and Prevention, http://www.cdc.gov/ncidod/dbmd/diseaseinfo/foodborneinfections_g.htm#mostcommon. Campylobacter, salmonella, and e. coli are all found in the intestines of animals, so that contamination occurs during the slaughter process. The Norwalk viruses are believed to spread primarily from one infected person to another, through handling of food by infected kitchen workers or fishermen.

² During a period of "heightened" testing in a two year period from 2004 to 2006, the USDA tested fewer than 700,000, or approximately 1% of the cattle slaughtered. See News Release, Statement by USDA Chief Veterinary Officer John Clifford (DVM) Regarding Positive BSE Test Results (Mar. 13, 2006). In contrast, the European Union countries tested more than 8 ½ million cows just in 2003, and tested over 6 million in just the first 9 months of 2004. See U.K. Food Standards Agency, Results of BSE testing in the EU, <http://www.food.gov.uk/bse/facts/cattletest>. In 2006, the USDA announced that it was reducing testing by 90%.

³ United States Government Accountability Office, GAO-05-214, Homeland Security: Much is being done to protect agriculture from a terrorist attack, but important challenges remain (Mar. 2005) (hereinafter "GAO Report on Agriculture").