

November 18, 2009

Re: the National Animal Identification System

To the Honorable Members of Congress:

The 100 undersigned organizations have repeatedly urged that Congress stop all funding for the National Animal Identification System (NAIS). While we are encouraged that funding for NAIS was significantly reduced this year, the issue remains of great concern to our members, who include conventional ranchers and farmers, organic farmers, property rights advocates, breeders of rare historical breeds, and consumers.

Congress has authorized \$5.3 million for NAIS in FY 2010, raising the question of whether USDA will spend this money to further advance NAIS implementation. Moreover, although NAIS is not contained in the current versions of the food safety bills, we are concerned that these, or other, bills could be used to implement NAIS through indirect means. We are thus writing to urge you to take every measure within your power to halt the implementation of NAIS by USDA and to oppose the inclusion of NAIS in any bills passed during this session.

We have written Secretary Vilsack to urge that USDA not use the \$5.3 million appropriated for NAIS to further advance this program. Instead, we recommend that USDA use this funding to:

- 1) Formally withdraw all pending rulemaking initiated by the agency to advance NAIS and pay the associated costs;
- 2) Pay all existing contractual obligations and NAIS related costs that USDA incurred prior to September 30, 2009;
- 3) Pay all costs associated with transferring the computer hardware acquired by USDA as part of NAIS to state animal health agencies, to enable state agencies to improve their ability to communicate among agencies in the event of a disease outbreak; and
- 4) Pay all costs associated with providing the people of the United States and Congress with an official, comprehensive report on all of the testimony USDA received at the NAIS listening sessions in 2009.

We urge this course of action because, 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 corporate-controlled confined animal feeding operations (CAFOs) and vertically integrated systems. This ill-conceived and badly implemented program should be halted.

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 corporate-controlled CAFOs and vertically integrated operations.

Below are just a few of the reasons that NAIS is fundamentally flawed:

- 1) 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.
- 2) 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.
- 3) Unfair burdens placed on family farms and sustainable livestock operations. NAIS would also impose significant reporting and paperwork burdens on small farms. In addition, sustainable livestock operations that 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.
- 4) 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.

We urge you to support the limited use of NAIS funding to shut down the program, and to re-focus the agency on measures that truly improve animal health and that respect the interests of both livestock owners and consumers.

We thank you for your consideration.

Sincerely,

*Acres USA*  
 Adopt a Farm Family  
 American Goat Society  
 American Grassfed Association  
 American Indian Horse Registry  
 American Policy Center  
 American Raw Milk Producers Pricing Assoc.  
 Arkansas Animal Producers Association  
 Bluebonnet Equine Humane Society

California Farmers Union  
 Carolina Farm Stewardship Association  
 Cattlemen's Texas Longhorn Registry  
 Chez Panisse  
 Citizens for Private Property Rights (MO)  
 Colorado Independent CattleGrower's Association  
 Community Farm Alliance (KY)  
 Constitutional Alliance  
 The Cornucopia Institute

Dakota Resource Council  
 Dakota Rural Action  
 Davis Mountain Trans Pecos Heritage Assoc. (TX)  
*Edible Austin*  
 Edible San Marcos (TX)  
 Empire State Family Farm Alliance (NY)  
 Equus Survival Trust  
 Fair Food Matters (MI)  
 Family Farm Defenders  
 Farm Aid  
 Farm and Ranch Freedom Alliance  
 Farm-to-Consumer Legal Defense Fund  
 Farmers Union of Adams County (ND)  
 Food and Water Watch  
 Food for Maine's Future  
 Freedom 21  
 Gun Owners of America  
 Idaho Rural Council  
 Independent Cattlemen of Iowa  
 Independent Cattlemen of Nebraska  
 Independent-Beef Association of North Dakota  
 Innovative Farmers of Ohio  
 International Texas Longhorn Association  
 Iowa Citizens for Community Improvement  
 Kansas Cattlemen's Association  
 Land Stewardship Project (MN)  
 Local Harvest  
 Maine Alternative Agriculture Association  
 Maine Organic Farmers and Gardeners Assoc.  
 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  
 Monroe/ LaCrosse County Farmers Union (WI)  
 Montana Cattlemen's Association  
 Montana Farmers Union  
 National Association of Farm Animal Welfare  
 National Family Farm Coalition  
 National Latino Farmers & Ranchers Trade Assoc.  
 Nebraska Sustainable Agriculture Society  
 North Carolina Contract Poultry Growers Assoc.  
 Northeast Organic Farming Assoc. - Connecticut  
 Northeast Organic Farming Assoc. - Massachusetts  
 Northeast Organic Farming Assoc. - New Hampshire  
 Northeast Organic Farming Assoc. - New York  
 Northeast Organic Farming Assoc. - Vermont  
 Northeast Organic Farming Assoc. Interstate Council  
 Northern Illinois Draft Horse and Mule Assoc.  
 Northern New Mexico Stockman's Association  
 Northern Plains Resource Council (MT)  
 Ohio Farmers Union  
 Oregon Livestock Producers Association  
 Oregon Rural Action  
 Organic Consumers Association  
 Organization for Competitive Markets  
 Ozarks Property Rights Congress (MO)  
 Paso Fino Horse Association  
 Powder River Basin Resource Council (WY)  
 Progressive Agriculture Organization (PA)  
 Property Rights Congress  
 R-CALF USA  
 Regional Farm and Food Project (NY)  
 Rocky Mountain Farmers Union  
 Secure Arkansas  
 Small Farmer's Journal  
 Small Farms Conservancy  
 South Dakota Stockgrowers Association  
 Sovereignty International  
 Stop Real ID Coalition  
 Sustainable Food Center (TX)  
 Texas Landowners Council  
 Texas Organic Farmers and Gardeners Association  
 US Boer Goat Association  
 Virginia Independent Consumers & Farmers Assoc.  
 Virginia Land Rights Coalition  
 Western Organization of Resource Councils  
 Weston A Price Foundation  
 Wintergarden Sustainable Agriculture Coalition (TX)

For more information, contact Judith McGeary at 512-484-8821 or [Judith@FarmAndRanchFreedom.org](mailto:Judith@FarmAndRanchFreedom.org)