

W O R C

Western Organization of Resource Councils

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National Animal Identification Proposals

Proponents have redoubled efforts to create a livestock identification system capable of tracking domestic livestock from birth to slaughter in response to discovery of BSE in a cow slaughtered in Washington State. Ensuring consumer confidence in the safety and health of the U.S. food supply while ensuring the economic viability of independent family farmers and ranchers is especially critical now. However, we have serious concerns about the U.S. Animal Identification Plan (USAIP) and federal legislative and regulatory proposals to accelerate implementation of that plan, and we are opposed to a centralized program that is solely administered by USDA, for the following reasons:.

1. The USAIP does not address the most immediate needs in the wake of the discovery of BSE: preventing introduction of foreign animal disease to the U.S. food supply, and informing consumers of the country of origin of their food.

The USAIP provides for trace-back of animals once an outbreak occurs. It does nothing to prevent *introduction* of BSE or other animal diseases in imported meat and livestock, and it ignores the risks of foreign animals already in the U.S.

- *Livestock should be permanently marked by country of origin before entering the U.S., and an investigation begun to identify and mark imported cattle already in the U.S.*
- *Any identification and trace-back system must apply to imported livestock and meat, and track country of origin information through to consumers on retail products.*

2. Development of a new, large, bureaucratic program would be more expensive for taxpayers, more expensive and intrusive for family farmers and ranchers, and would take longer to put in place than minor modifications to existing animal identification and trace back programs. Any traceback and identification system is best administered by existing state agencies.

A longstanding, effective program identifies cattle vaccinated for brucellosis and allows trace-back.¹ The system is overseen by USDA's Animal and Plant Health Inspection Service (APHIS), and run by state animal health or livestock boards. In a separate system, state officials "back-tag" all animals going to slaughter, resulting in a record of the state in which the animal was tagged and an identification number. USAIP envisions electronic ear tags at cost of \$400 million over five years, a large burden to livestock producers already struggling with low prices and rising expenses.

- *National animal identification should build on existing animal health and ownership brand identification programs, rather than duplicating and complicating them.*

¹ Similar programs for sheep (to track incidents of scrapie) and hogs (for cholera). Vaccinated cattle get an ear tattoo and an accompanying ear tag.

- *All additional costs of any system should be borne by the Federal government.*

3. The USAIP would collect proprietary information and could collect other information about how animals are produced that could be misused if it is not strictly controlled.

Collection of private ownership information creates potential privacy risks for financial information of farmers and ranchers. The USAIP would have information on livestock ownership and could collect information on genetics, management, and other information that could be used by meatpackers to discriminate among producers or dictate production practices to livestock producers.

- *Data collected under any animal identification and trace-back system should be accessible only to state and tribal animal health agencies, APHIS, and Homeland Security, and only for the purposes of official disease investigation.*

4. The USAIP could foster profiteering.

The USAIP would allow livestock commodity organizations and for-profit entities to manage or subcontract for implementation of animal identification systems. A rush to create a new system could create unnecessary costs, paid to private companies and special interest groups, for duplicative systems.

- *Any system should be carefully managed in full cooperation and partnership between federal, state and tribal animal health agencies.*

5. The USAIP could expose family farmers and ranchers to unwarranted liability.

Unless it is carefully developed, animal identification information could be used to shift liability for food contamination incidents from packers and processors back to farmers and ranchers.

- *Livestock producers should not be liable for claims other than those made by the governmental agencies authorized to access data collected under the system.*