

# WORC

## *Western Organization of Resource Councils*

April 8, 2009

U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Secretary Vilsack,

The Western Organization of Resource Councils (WORC) is a regional network of seven grassroots community organizations that include 10,000 members and 45 local chapters in Colorado, Idaho, Montana, North Dakota, Oregon, South Dakota, and Wyoming. WORC members represent farmers and ranchers, consumers and other working people of our region, all of whom will be impacted by the National Animal Identification System (NAIS) as proposed by U.S. Department of Agriculture (USDA) and Animal, Plant and Health Inspection Service (APHIS).

For over 5 years, USDA has been developing a National Animal Identification System. USDA has spent over \$130 million on NAIS so far, and just this year another \$14 million was appropriated. Even though APHIS and USDA have issued a number of business plans, many questions remain for the producers we represent. Therefore, we have a number of questions we would like you to answer to help our members better understand the application of what appears to be a very cumbersome program.

- 1) House Agriculture Committee members and the Extension Service and the media at one time or other have characterized NAIS as being
  - a marketing program
  - a disease control/elimination program
  - a food safety program
  - a homeland security program

Is NAIS conceived to deliver on all of these program goals and if so how will this program accomplish each of these goals?

- 2) There are currently ongoing programs to control/eliminate various important livestock diseases (brucellosis, tuberculosis, BSE, scrapie, etc.) each of which has specific protocols and systems already in place:
  - Will NAIS eliminate and supplant these programs?
  - If so how will NAIS accomplish the program transfer?
  - Why will the NAIS program be superior to what is already in place?

- 3) Many states have brand laws along with a system of brand inspection and health certification for cattle. Will NAIS:
  - Supplant and eliminate the brand system for the control of livestock movement?
  - If so why will the NAIS system be superior to the system based on brands?
  - What will be the role of the state veterinary offices in the NAIS system?
  
- 4) It continues to be unclear as to who will maintain and pay for the NAIS data base system.
  - Will USDA maintain the data base or will it be contracted to an interested organization or private enterprise?
  - What is the anticipated cost of maintaining this data base and who will finance the data base?
  - How many persons will be required to operate the system?
  - How will the accuracy of data be policed?
  - How will the security of the information be insured?
  - Who will have access to the information and under what circumstances?
  
- 5) USDA already issues Premise Identification Numbers (PIN) for the Scrapie program and for the Farm Services Agency. Will the NAIS system replace these PIN systems and if so how will this be accomplished? And will the NAIS PIN system be based upon:
  - Livestock ownership?
  - Headquarters or business location?
  - Physical pasture?

Furthermore:

  - How will changes in ownership, headquarters, or pastures be recorded and updated?
  - Who will be responsible to record/update those changes?
  - If there is more than one owner but livestock are comingled, will each owner be required to have a separate PIN?
  
- 6) Livestock producers are concerned about the type and scope of information that would be collected and who will have responsibility for that information.
  - What kinds of information (ownership, location, birth, death, sale, vaccination etc.) will be collected?
  - Who will be responsible to collect that information?
  - What will be the penalties for inaccurate or incomplete information?
  - How will USDA accommodate livestock owners who do not have the equipment and/or information technology capability to participate in the NAIS system?

- 7) In this time of huge budget deficits, high input costs for livestock production and economic downturn, livestock producers are concerned about the costs of this program to both producers and other tax payers.
- What is the projected cost to the government for this program?
  - What are the anticipated costs to the individual livestock owner?
  - Has USDA done a cost/benefit analysis to determine :
    - the costs to the industry, individuals, and government compared to existing ongoing programs?
    - whether the anticipated benefits warrant the overall costs of this program?
- 8) We do know from USDA documents that all official NAIS tags will start with the numbers 840 to indicate the United States. However, the format of those tags has changed a number of times from radio frequency, to plastic tags.
- What form of tags does USDA intend to use for this program?
  - How will USDA ensure there is not profiteering by corporate agribusiness at the expense of livestock producers?
- 9) Although USDA claims that NAIS is a voluntary program, recent USDA actions and statements seem to lean toward mandatory participation.
- Is NAIS mandatory or voluntary?
  - If it is voluntary except under certain circumstances, what will those circumstances be?

We appreciate you taking the time to answer these questions and look forward to your response. If you have questions or would like more information from WORC, please contact Jeri Lynn Bakken, WORC Regional Organizer, at (701) 376-7077 or by email at [jerilynn@worc.org](mailto:jerilynn@worc.org).

Sincerely,

Mabel Dobbs  
WORC Livestock Committee Chair  
Weiser, ID

CC: Congressional Delegations  
Colorado  
Idaho  
Montana  
North Dakota  
Oregon  
South Dakota  
Wyoming