

Fighting for the U.S. Cattle Producer!



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April 19, 2010

The Honorable Tom Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

Sent via facsimile and U.S. Mail: 202-720-6314

Re: Disposition of USDA Cooperative Agreement Seeking Premises Registration

Dear Secretary Vilsack:

As we have expressed in earlier correspondence, R-CALF USA supports your Feb. 5, 2010 decision not to implement the previous Administration's National Animal Identification System (NAIS) and to, instead, work with the states, tribes and producers to develop a new framework for improving animal disease traceability in the United States. Your decision alleviated one of our organizations strong objections to the NAIS concept – the registration of livestock producers' premises.

Our staff and members are now working with your agency and with their respective state animal health officials and tribal officials to help develop workable performance standards to enable traceability of livestock moving in interstate commerce, without necessitating or promoting premises registration. We have been encouraged by assurances made by officials of your agency that you are not calling for premises registration as a part of the new framework now being developed.

We are calling to your attention a concern raised by the attached *Notice of Cooperative Agreement Award Between the Arkansas Livestock and Poultry Commission (Cooperator) and the United States Department of Agriculture Animal and Plant Health Inspection Service (APHIS) Veterinary Services (Cooperative Agreement)*. This Cooperative Agreement was signed by the Cooperator months after your Feb. 5, 2010 decision, which we interpreted as one that effectively halted your agency's aggressive promotion of, and emphasis on, premises registration.

As indicated within the Cooperative Agreement, the Cooperator is seeking federal funding from your agency for the primary purpose of registering premises. The goal of the Cooperator is clearly stated on Page 11 of the accompanying *Objectives and Need for the Assistance*: "Our goal is to register 30% of Arkansas's livestock producers by March 31, 2011."

If this Cooperative Agreement is approved, and we do not know if such approval has been granted, it would directly contradict the pledge by your agency to work with producers, states and tribes to develop a *new* framework for animal identification. The Cooperative

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Agreement, if approved by USDA, represents an aggressive, full-steam-ahead approach to implementing the objectionable, key component of NAIS – premises registration. In addition, approval of the Cooperative Agreement would signal that your agency has predetermined that premises registration, the very foundation of NAIS, shall be an integral component of any new framework for animal identification, regardless of any consensus that may be reached by producers, states and tribes.

Please inform us as to whether your agency has approved the attached Cooperative Agreement and whether your agency has approved any similar cooperative agreements with other states. If this Cooperative Agreement, or any similar cooperative agreement with other states that seeks to register producers' premises, has been approved by your agency since Feb. 5, 2010, please help us understand how this action can be reconciled with your commitment to develop a *new* framework for animal identification in cooperation with U.S. producers, states and tribes.

We fully recognize that you may have no control over proposals that state agencies may choose to submit to secure federal funding. It is our hope that the attached Cooperative Agreement is a non-solicited proposal that has been rejected by your agency and we are seeking confirmation that this is the case.

Thank you for your consideration of this important matter.

Sincerely,



R.M. Thornsberry, D.V.M.
President, R-CALF USA Board of Directors

Attachment: Cooperative Agreement

Cc: Edward Avalos, Under Secretary, USDA
John Ferrell, Deputy Under Secretary, USDA
Dr. John Clifford, APHIS