



Ranchers-Cattlemen Action Legal Fund – United Stockgrowers of America

**Written Testimony Submission to the United States House of
Representatives Agriculture Subcommittee on Livestock Regarding
the Privatization of the National Animal Identification System**

October 11, 2005

The Ranchers Cattlemen Action Legal Fund - United Stockgrowers of America (R-CALF USA) is a non-profit association representing over 53,000 cattle producers, over 18,000 of whom are voluntary, dues-paying R-CALF USA members, and over 43,000 are members of R-CALF USA's 60 affiliated ranch and cattle associations. R-CALF USA represents U.S. cattle producers on issues concerning national and international trade and marketing and is dedicated to ensuring the continued profitability and viability of the U.S. cattle industry. R-CALF USA's membership consists primarily of cow-calf operators, cattle backgrounders, and independent feedlot owners. Various main street businesses are associate members of R-CALF USA.

R-CALF USA's views on USDA's recent announcement to develop a "public/private partnership that enables the private sector to maintain animal movement data as part of the National Animal Identification System"

R-CALF USA is concerned with the announcement by Agriculture Secretary Mike Johanns that the U.S. Department of Agriculture (USDA) has decided that a single, privately held animal-tracking repository will track and maintain animal-movement data for the agency's National Animal Identification System (NAIS).

USDA is headed down the wrong course in a matter that is vitally important not only to the U.S. cattle industry, but also one that is truly a legitimate health issue with significant implications for the general public. It concerns us greatly that USDA would entrust such a sensitive responsibility to private organizations that are not statutorily responsible for animal health and welfare, not accountable to the public or the industry, may have political motivations, and that may be desirous to profit or otherwise benefit from access to proprietary producer/production information. This arrangement could lead to potential abuses and intentional misuse of information that could damage individual producers and potentially harm the markets. If USDA insists upon implementing a national animal identification program, it should be administered and operated by the federal, state and

tribal animal health agencies that have a statutory responsibility to maintain the health and welfare of the U.S. livestock industry.

Protecting U.S. livestock from outbreaks of foreign animal disease and by extension, protecting the public from exposure to a foreign animal disease outbreak, is a national security issue. As such, only the official department(s) charged with the statutory responsibility to ensure the health and safety of U.S. livestock and the safety of the American people should administer a program designed to achieve this public objective. Importantly, only such official departments can be held accountable to the public for not administering the program properly. The program should be administered by APHIS in coordination with state animal health departments and tribal governments. If the success of the program is to be measured by whether or not animals in the vicinity of a disease outbreak can be traced within 48 hours, then the agency needing the information to achieve such an objective should have both the authority and responsibility for the program's administration and operation.

How is your industry working to accommodate such a system?

R-CALF USA, its affiliates, like minded associations and stakeholders are committed to working with Congress and the USDA to ensure that any national animal I.D. system remains under the jurisdiction of existing animal health agencies. R-CALF USA continues to support current animal identification systems in existence today, including the numerous state branding programs and the numerous market-driven, voluntary source verification programs currently underway. R-CALF USA also supports pilot animal identification projects presently underway, particularly those that build upon existing identification systems and attempt to conduct an accurate cost/benefit evaluation.

The USDA has not provided the U.S. cattle industry with the most critical information needed to make an informed decision regarding whether the cost of a national animal identification system is economically feasible. The USDA estimated the cost of the much less elaborate country of origin verification system would be \$10 per animal. Based on the U.S. cattle herd size, this provides a very rough starting-point cost estimate of nearly \$1 billion. This represents a significant cost for the United States' cattle industry, which generates a gross income from the sale of cattle and calves of about \$45 billion. Up until two years ago the 750,000 cattle producers remaining in the U.S. experienced over a decade's worth of depressed prices, resulting in staggering losses to the industry measured in billions of dollars. Because the USDA has not provided even a basic cost estimate for a national animal identification system, it would be fiscally irresponsible for any representative of the U.S. cattle industry to support USDA's proposal. R-CALF USA does not support the USDA's proposal and continues its request for a comprehensive cost/benefit analysis before the agency proceeds any further with its proposal.

What responsibilities the federal and private sector should have in establishing such a system?

The USDA must first provide the industry with the basic information needed to responsibly evaluate the agency's proposal. The industry needs to know the expected costs of such a system as well as the expected benefits. Any data base essential to the performance of identifying and tracing animals exposed to a disease outbreak should be exclusively managed by the federal government in coordination and cooperation with state animal health authorities, including state brand boards, and tribal governments, which are already charged with the statutory responsibility to maintain the health and welfare of both livestock and the American people. Tribal and state animal health authorities have a long history of providing exceptional animal disease control for our industry. USDA's proposal would set the nation's animal disease prevention and control capabilities on a backwards course.

The potential abuses by private firms or associations, whether at the national or state level are too great to allow a profit motivated firm or association to administer a program designed to ensure the health and safety of U.S. livestock and human health. There should not be any consideration given to allowing state-wide firms or associations to administer the proposed program unless such entities are contracted to conduct other animal health related services for the state's animal health department. There has been a long, successful tradition for this type of relationship and USDA should encourage these cooperative efforts.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink that reads "Richard Bowman". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Richard Bowman, DVM
Animal ID Committee Chair