R-CALF USA 2006 Position Paper:
National Animal Identification System

- R-CALF USA believes that identifying animals in order to allow for traceback and source verification can be an important component of disease control and eradication. While sharing the goal of improved animal health and consumer safety underlying the creation of the National Animal Identification System (NAIS), R-CALF USA is seriously concerned about the manner in which the program is being implemented.

- First, any system should build on the strength of the animal identification systems that already exist today, including state branding programs, source verification systems driven by the market, and pilot animal identification projects such as the Intertribal Cattle Connect.

- Second, while R-CALF USA is not convinced that a mandatory system is ultimately needed, if a mandatory system is to be created, it is essential that it be administered and operated by federal, state and tribal animal health agencies. These are the agencies with the expertise, the experience, and the statutory responsibility to protect animal health.

- If Congress and the administration determine that a mandatory system is required to protect the public interest, it must be a publicly-funded and operated system. There has been no initial estimate of what such a mandatory system may cost, but these costs are likely to be substantial. Producers should not bear the full brunt of the costs of a mandatory system enacted for the public benefit.

- In addition, it is vital that any mandatory system remain in public hands to avoid manipulation of the system for private advantage. In particular, the proposal that a single, privately-held animal-tracking repository hold all animal source and movement data poses serious concerns. Private access to and control over such data could lead to misuse of the data for private ends. It is essential that the privacy of such data be fully protected, and it only be accessed for the legitimate health and safety objectives of the program.

- R-CALF USA is committed to working with Congress and the Administration on animal identification to ensure:

  - The industry is fully informed of the expected costs and benefits of any proposed system;

  - Producer input is taken into account and weighed fully before any mandatory system is created;

  - If a single tracking database is created and submission of producer data are mandated, the system is exclusively managed by the federal government in coordination with state and tribal animal health authorities; and

  - Any national identification system builds upon the success of existing animal identification systems, and there should be strong support for such systems and pilot projects that comply with national standards and protect producer data.