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The Honorable Collin Peterson, Chairman
House Agriculture Committee
United States House of Representatives
2211 Rayburn House Office Building
Independence Ave. & S. Capitol St., NW
Washington, D.C. 20515

Sent via facsimile, e-mail, and U.S. mail
RE: R-CALF USA Opposes Plan to Marry NAIS and COOL

Dear Chairman Peterson,

The Ranchers-Cattlemen Action Legal Fund, United Stockgrowers of America (R-CALF USA) is an organization of approximately 15,000 cattle ranchers and farmers. The R-CALF USA Animal Identification Committee strongly urges you to not tie mandatory or voluntary animal identification (Animal ID) to the country-of-origin labeling (COOL) law. The COOL law expressly forbids the use of an animal identification system for verifying the origins of covered commodities. Mandatory or voluntary Animal ID is an animal health traceback program that should remain completely separate from COOL. Because the currently proposed National Animal Identification System (NAIS) requires far more information than merely the country-of-origin of animals, most of the information that would be collected under a NAIS electronic animal identification (EID) program would end at the packing house floor and would be of no benefit to consumers, while being costly and burdensome for livestock producers.

R-CALF USA believes the cost of a mandatory EID program grossly outweighs the benefits. For example, EID tags range in cost from \$2 to \$10 per head, depending upon whether one uses low or high frequency tags. In addition, each cattle producer would have to pay someone to read and compile the data. This has been estimated to cost at least 30 cents per head each time an animal is moved from one premise to another—not to mention the cost of computer equipment needed to support the EID tags. R-CALF USA believes that existing animal ID programs, such as the brucellosis and tuberculosis programs, as well as hot iron brands and brand inspection, are time-proven, cost effective health traceback programs with excellent track records that have served our industry very well.

There is a very real need for COOL so consumers can make an informed choice as to which country's production standards are applicable to the food they purchase. This is especially true following the recent announcement by the Food and Drug Administration – after it was discovered that imported melamine had contaminated pet food and swine feed – that only about 1 percent of the imported food for human and livestock feed that enters the U.S. actually is inspected. If COOL and Animal ID are tied together, support for COOL would diminish. In the end, both consumers and livestock producers would lose. Again, we strongly urge you to keep COOL and Animal ID completely separate.

Respectfully,

Kenny Fox, Chair
R-CALF USA Animal Identification Committee