

Fighting for the U.S. Cattle Producer!



R-CALF
USA

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

Re: R-CALF USA's Eight-Point Alternative to NAIS: A Practical Solution to Improve Animal Disease Prevention, Control and Eradication, as well as Meat Food Safety in the United States

Dear Secretary Vilsack:

We are pleased that during a hearing on Tuesday, March 31, 2009, you expressed concern about moving forward with the previous Administration's proposed National Animal Identification System (NAIS) before you visit with opponents of the program to address our objections.

R-CALF USA still urges USDA and Congress to immediately and completely abandon NAIS because of its many flaws. Instead, we would like to recommend that USDA and Congress focus on targeted solutions to the legitimate livestock disease-related challenges faced by U.S. livestock industries, and take steps to meaningfully address legitimate food safety challenges, as are evidenced by recent and massive recalls of meat produced in U.S. slaughtering plants.

Specifically, R-CALF USA recommends the following eight-point alternative course:

1. Prevent the importation of serious cattle diseases and pests from foreign sources by:
 - a. Prohibiting the importation of livestock from any country that experiences outbreaks of serious zoonotic diseases, including pests, until scientific evidence demonstrates the diseases and/or pests have been eradicated or fully controlled and there is no known risk of further spread. This recommendation includes a request for an immediate ban on live cattle imports from Canada, which harbor a heightened risk for BSE.
 - b. Requiring all imported livestock to be permanently and conspicuously branded with a mark of origin so identification can be made if a zoonotic disease or serious pest outbreak occurs in the exporting country subsequent to importation.

- c. Requiring all livestock imported into the United States to meet health and safety standards *identical* to those established for the United States, including adherence to U.S. prohibitions against certain feed ingredients, pesticide use on feedstuffs, and certain livestock pharmaceuticals.
 - d. Requiring TB testing of all imported Mexican cattle and further requiring that all Mexican cattle remain quarantined in designated feedlots until slaughtered.
 - e. Reversing USDA's efforts to carve out regions within disease-affected foreign countries in order to facilitate imports from the affected country before the disease of concern is fully controlled or eradicated.
 - f. Increasing the testing of all imported meat and bone meal to prohibit contaminated feed from entering the United States.
2. Adopt the surveillance and identification components of the preexisting brucellosis program, including the metal eartag and tattoo that identifies the state-of-origin and the local veterinarian who applied the identification devices, and require breeding stock not otherwise identified through breed registries to be identified at the first point of ownership transfer.
3. State and Tribal animal health officials should be solely responsible for maintaining a statewide database for all metal tags applied within their respective jurisdictions and should continue to use the mailing address and/or the production unit identifier determined appropriate by the attending veterinarian to achieve traceback to the herd of origin should a disease event occur. Under no circumstances should the Federal government maintain a national registry of U.S. livestock or require the national registration of producers' real property.
4. The Federal government should enter into agreements with State and Tribal animal health officials to pay for the States' and Tribal governments' costs of identifying breeding stock and maintaining the State and Tribal databases, as well as bolstering disease surveillance at livestock collection points such as livestock auction yards and slaughtering plants, including increased surveillance for BSE.
5. The Federal government should coordinate with the States and Tribes to establish electronic interface standards and to establish improved communication protocols so it can more effectively coordinate with the States and Tribes in the event of a disease outbreak.
6. The Federal government should coordinate with the States and Tribes to establish improved protocols for the retention and searchability of State and Tribal health certificates, brand inspection documents and other documents used to facilitate interstate movement of livestock.
7. Establish specific disease programs and focus increased resources toward the eradication of diseased wildlife in States where wildlife populations are known to harbor communicable diseases.

8. To address the challenge of increased incidences of tainted meat products, Congress and USDA must substantially reform the current hands-off inspection system known as Hazard Analysis and Critical Control Point (HACCP). HACCP has fundamentally failed to ensure adequate sanitary practices at major slaughterhouse establishments. As part of the HACCP reform, Congress should implement a requirement that meat sold at retail and at food service establishments be traceable back to the slaughterhouse that produced the meat from live animals, not just back to the processor that may have further processed tainted meat. This simple improvement would enable investigators to determine and address the actual source of meat contamination – primarily the unsanitary conditions that allow enteric-origin pathogens, such as *E. coli* O157:H7, to contaminate otherwise healthful meat.

We appreciate your consideration of these recommendations and look forward to working with you to enhance our nation's animal disease preparedness in a manner that builds upon our past successes and does not infringe on the rights and privileges of U.S. livestock producers.

Sincerely,



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

cc: Members of Congress
State Animal Health Officials