

September 10, 2009

Re: 2010 Agriculture Appropriations bill and the National Animal Identification System

To the Honorable Members of the Agriculture Appropriations Conference Committee:

The undersigned organizations urge you to adopt the House version of the 2010 Agriculture Appropriations bill with respect to the National Animal Identification System (NAIS), eliminating the funding for NAIS. Contrary to its stated purposes, NAIS will not address animal disease or food safety problems. Instead, NAIS imposes high costs and paperwork burdens on family farmers and creates incentives for CAFOs and vertically integrated systems. This ill-conceived and badly implemented program should not receive any federal funding, and we urge the conference committee to adopt the House version of the bill on this issue.

USDA's plans for NAIS describe a far-reaching three-step program that calls for every person who owns even one livestock or poultry animal to register their property, tag each animal when it leaves the property it was born on, and report a long list of movements to a database within 24 hours. The provisions would apply whether or not that animal is used for commercial purposes. NAIS would directly impact millions of animal owners. Group or lot identification would only be allowed where animals are managed as a group from birth to death and never commingled with animals outside of their production system. In practice, group identification would apply mainly, if not entirely, to confined animal feeding operations (CAFOs) and vertically integrated operations.

Our organizations have sent previous letters outlining the many problems with NAIS. In this letter, we will touch on just a few of the reasons that NAIS is fundamentally flawed:

- 1) No analysis or quantification of the alleged benefits. USDA has made unsupported assertions that our country needs 48-hour traceback of all animal movements for disease control. Yet USDA has failed to provide any scientific basis, including risk analysis or scientific review of existing programs, to support this claim. USDA has also asserted that NAIS would provide 48-hour traceback, but has failed to address the many technological and practical barriers. Existing disease control programs, combined with measures such as brand registries and normal private record-keeping, provide cost-effective traceback. A new and costly program such as NAIS is unnecessary and potentially counterproductive.
- 2) High costs. The costs of complying with NAIS will be unreasonably burdensome for small farmers and many other animal owners. The costs of NAIS go far beyond the tag itself, and include: premises registration database creation and updates; tags and related equipment, such as readers, computers, and software; 24-hour reporting requirements, imposing extensive paperwork burdens; labor for every stage of the program; stress on the animals; qualitative costs, from loss of religious freedoms, privacy, and trust in government; and enforcement.
- 3) No food safety benefits. NAIS will not prevent foodborne illnesses from *e. coli* or salmonella, because the contamination occurs at the slaughterhouse, while NAIS tracking ends at the time of slaughter. Thus, NAIS will neither prevent the contamination nor increase the government's ability to track contaminated meat back to its source. In addition, NAIS will hurt efforts to develop safer, decentralized local food systems.
- 4) Unfair burdens placed on family farms and sustainable livestock operations. NAIS would also impose significant reporting and paperwork burdens on small farms. In addition, sustainable livestock operations that manage animals on pasture would face higher rates of tag losses than confinement operations, due to animals getting their tags caught on brush or fences. NAIS essentially creates incentives for CAFOs, with the accompanying social and environmental concerns.

For these reasons, we strongly urge you to adopt the House position and eliminate funding for NAIS in the 2010 Appropriations bill. We thank you for your consideration.

Acres USA
Adopt a Farm Family
Alabama Sustainable Agriculture Network
American Goat Society
American Grassfed Association
American Indian Horse Registry
American Policy Center
Arkansas Animal Producers Association
California Farmers Union
Carolina Farm Stewardship Association
Carriage Operators of North America
Cattlemen's Texas Longhorn Registry
Citizens for Private Property Rights (MO)
Colorado Independent Cattlegrowers Association
Constitutional Alliance
The Cornucopia Institute
Dakota Resource Council
Dakota Rural Action
Davis Mountain Trans Pecos Heritage Assoc. (TX)
Edible Austin
Edible San Marcos (TX)
Empire State Family Farm Alliance (NY)
Equus Survival Trust
Fair Food Matters (MI)
Family Farm Defenders
Farm Aid
Farm and Ranch Freedom Alliance
Farm-to-Consumer Legal Defense Fund
Food and Water Watch
Food for Maine's Future
Freedom 21
Grassroots International
Gun Owners of America
Independent Cattlemen of Iowa
Independent Cattlemen of Nebraska
Independent Cattlemen of Wyoming
Innovative Farmers of Ohio
International Texas Longhorn Association
Iowa Citizens for Community Improvement
Jackson County Local Action Coalition (OR)
LaCrosse/ Monroe County Farmers Union (WI)
Local Harvest
Maine Alternative Agriculture Association
Maine Organic Farmers and Gardeners Association
Marshall County Citizens for Property Rights (AL)
Massachusetts Smallholders Alliance
Michigan Farmers Union
Michigan Land Trustees
Michigan Organic Food and Farm Alliance
Mississippi Livestock Markets Association
Missouri Rural Crisis Center
Missourians for Local Control
Montana Cattlemen's Association
Montana Farmers Union
National Association of Farm Animal Welfare
National Family Farm Coalition
Nebraska Sustainable Agriculture Society
North Carolina Contract Poultry Growers Assoc.
Northeast Organic Farming Association-Connecticut
Northeast Organic Farming Assoc.-Massachusetts
Northeast Organic Farming Assoc.-New Hampshire
Northeast Organic Farming Association-New York
Northeast Organic Farming Association-Vermont
Northeast Organic Farming Assoc. Interstate Council
Northern Illinois Draft Horse and Mule Association
Northern New Mexico Stockman's Association
Northern Plains Resource Council (MT)
Organic Consumers Association
Organization for Competitive Markets
Ozarks Property Rights Congress
Paragon Foundation
Paso Fino Horse Association
Powder River Basin Resource Council (WY)
Progressive Agriculture Organization (PA)
Property Rights Congress
R-CALF USA
Regional Farm and Food Project (NY)
Rocky Mountain Farmers Union
Secure Arkansas
Small Farmer's Journal
Small Farms Conservancy
South Dakota Stockgrowers Association
Sovereignty International
Stop Real ID Coalition
Sustainable Food Center (TX)
Texas Eagle Forum
Texas Landowners Council
Tuscaloosa Property Rights Alliance (AL)
US Boer Goat Association
Virginia Land Rights Coalition
Western Organization of Resource Councils
Weston A Price Foundation
Wintergarden Sustainable Agriculture Coalition (TX)

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