

Dear Dr. Clifford:

We are deeply troubled by your USDA Blog titled “An Update on the Animal Disease Traceability Framework” and posted on July 27, 2011. Your blog omits entirely what we believe to be the most important promise USDA made to our cattle industry on February 5, 2010. That promise, which USDA repeated throughout its 2010 explanation of its new approach to achieving animal disease traceability, was to establish a system that provided cattle producers with the flexibility to choose the type of identification device that works best for them, including the choice to continue using a hot-iron brand.

USDA’s 2010 written explanation stated it would establish a system “that is flexible and lets States, Tribal Nations, *and producers* use their expertise to find and use the animal disease traceability approaches that work best for them.” (Emphasis added.)

USDA reinforced this promise by clearly stating the flexibility to be extended to cattle *producers* included the producer-option of choosing to use brands as their choice of an official animal identification device. USDA expressly stated, “USDA will maintain a list of official identification devices, which can be updated or expanded based on the needs of the States and Tribal Nations. There are many official identification options available, such as branding, metal tags, RFID, just to name a few.” (Emphasis added.)

Your blog, however, indicates that USDA intends to break its promise to cattle producers by removing brands from the list of official identification options, thus reducing the flexibility producers now enjoy and eliminating options that are currently available to them. Under your proposal, the choice to use a registered brand for identifying cattle in interstate commerce is no longer an option for individual cattle producers and no longer an option for an individual State or Tribal Nation. Instead, the option to continue using brands to identify cattle in interstate commerce *will only be available* if two States and/or two Tribal Nations mutually agree to continue using the brand despite its demotion from the list of approved official identifications options.

Your blog makes it clear that USDA intends to break its promise to U.S. cattle producers and we find such a dishonorable action not only unbecoming of a federal agency, but also, unacceptable.

Sincerely,

A handwritten signature in cursive script that reads "Kenny Fox".

Kenny Fox
Chair
R-CALF USA Animal Identification Committee