

R-CALF United Stockgrowers of America

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Nancy J Robinson, VP, Government & Industry Affairs Livestock Marketing Association

Sent via e-mail

Dear Nancy:

While R-CALF USA appreciates your efforts to lead the Cattle ID Group (CIDG) toward a consensus, our organization does not agree with or support the CIDG's final comments on the U.S. Department of Agriculture's (USDA's) proposed Animal Disease Traceability Rule.

We tried to encourage the CIDG to ensure that USDA incorporated the core principles previously agreed to by the CIDG. Those core principles, which we still agree with today, included: 1) voluntary identification of adult cattle changing ownership by 2015; 2) liability protections against acts of others after cattle leave their control; and, 3) flexibility in the use of all current (and future) identification methods.

The CIDG's final comments do not advance those principles. They acquiesce to an immediate, mandatory identification regime. They are silent on the book-end approach that guarantees a producer, whose number is on a disease-infected animal, will receive the brunt of liability-related actions. And, they support limitations on the continued use of time-proven identification devices and methods.

We are disappointed the CIDG chose not to aggressively fight to develop a workable traceability system that incorporated all of the group's core principles. We were unsuccessful in our efforts to engage the CIDG in discussions regarding the group's core principles, including our recent effort to discuss seemingly invalid arguments against the hot-iron brand. There isn't much else we can do except continue on our own to defend the group's original core principles.

We do not want R-CALF USA's name included in the CIDG's final comments. If you feel compelled to mention our involvement, then we request you clearly state the following: "While R-CALF USA participated in CIDG discussions, it does not agree with or support the final comments completed by the CIDG." Again, we thank you for your efforts despite our disappointment in the outcome.

Sincerely

Kenny Fox

Chair, R-CALF USA Animal ID Committee

Kenny Fox