Animal ID/USDA Comments

My name is Terry Detrick, a cattle producer from Ames, Oklahoma. I am also Vice President of Oklahoma Farmers Union, a general farm organization with 100,000 family memberships. We represent livestock and other commodity producers in this state. I am also on the Oklahoma Beef Council and served on the NAIS Beef Working Group/Cattle Working Group and a member of NCBA.

I support:

- Establishing a uniform national standard for uniquely identifying locations that produce, manage, and/or hold livestock,
- Establishing the ability to trace a diseased animal of concern from the point of diagnosis through the marketing chain to the herd of origin within 48 hours,
- Adopting uniform data standards throughout the U.S. supporting premises registration, animal identification, and animal tracking,
- Mandated implementation for all livestock species,
- Cooperative efforts by industry and government to achieve the desired 48 hour traceback,
- Secured, reliable and confidential information.

I strongly support the NAIS Cattle Industry Working Group calling for the individual identification of all cattle, utilizing ISO-compliant Radio Frequency Identification Device (RFID) ear tags as the standard for implementing the NAIS in the U.S. cattle industry as a number one priority.

I do not support the 'technology neutral' philosophy because I believe this would cause all of the various segments of the livestock industry to have a need for all forms of ID equipment just in case an animal shows up with a varying type of ID device thus causing inefficiency and confusion and will be a detriment to participation.

I support the NAIS objective to report to a national database all changes of ownership, interstate movements, and commingling of multiple owners of livestock to accomplish the overall objective and goal of the NAIS.

It is imperative that each producer, if he has one animal or thousands, must realize the responsibility he has to protect the health of the livestock industry. Given human nature, some people will not participate in the program until they have to. **Therefore, I support making the NAIS mandatory.**

Animal health, ID, and traceback is a food safety issue and absolutely necessary for national security. Therefore, all taxpayers should stand their share of the costs of implementing and maintaining the NAIS. I encourage APHIS to seek additional, adequate federal funding to support technology and infrastructure development.

I support the Cattle Working Group's plan that every animal must be identified **on or before the first point of entering commerce, commingling with multiple owners, or interstate movement.**

I support entrepreneurial opportunities for establishing official tagging sites to accommodate producers who may not have adequate facilities. This would allow an official tagging site to tag an animal provided the producer can furnish his/her premise ID number to which the animals tag would be assigned as the premise of origin.

I support the general concept that the receiving premise is the entity ultimately responsible for reporting the movement of livestock. In the case of a change of ownership, the system needs to provide the seller the ability to verify that his ownership of the cattle has been terminated/reported.

The NAIS must be accomplished electronically. However, paper-trail capability must be provided for producers such as the Amish owned auction markets by way of a national standard format to ensure data entry success. Producer access to these reporting forms could be made available through local vet, extension, FSA, producer organizations and sale barn offices.

The NAIS must be cost effective and efficient. This can be accomplished electronically. By all means, least cost to producers is a must.

All information contained in the NAIS should be protected from disclosure. The animal tracking component promises to provide animal health authorities the opportunity to significantly improve plans to prevent and control disease outbreaks. On the other hand, this same data set if accessed by the public could be used significantly to start a disease outbreak.

I STRONGLY OPPOSE PRIVATE DATA MANAGEMENT:
In Order for the state/federal veterinary infrastructure to respond to an animal disease outbreak or threat in a timely manner, the state veterinarian must be able to go to a central data system and bring up the record of all movements for the animal in question. Sale barn and meat packing plant managers at the end of the day should have the ability to access one data system and download the identification of the various individual animals and species marketed/harvested that day.

They do not have time to query each private data management system in the country to generate an animal's record. In addition, sale barn managers at the end of the sale day should not be asked to query each private data management company in the country to try and figure out what cow, pig, sheep or goat's movement record goes to what data manager.

The advantage of the proposed NAIS data management system is that it allows one system in which to enter data and the same 'one' system for animal health officials to access.

If multiple private entities are allowed to maintain data systems, all of the above deficiencies could exist and in addition, those we fear the most of gaining information about our livestock production industry could infiltrate organizations and do irreparable harm to the industry. In addition, what is to guarantee that a private entity maintaining a data bank will still be around years from now and what do we do about lost data?

Thank you for the opportunity to submit these comments and participate in the process.

Terry Detrick