DEPARTMENT OF AGRICULTURE

ANIMAL PLANT HEALTH INSPECTION SERVICE

Docket No. 05-015-1

National Animal Identification System

Notice of Availability of a:

Draft Strategic Plan and Program Standards

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I am a Wisconsin dairy producer representing the Wisconsin Holstein Association, one of sixty producer organizations in our state working together through the Wisconsin Livestock Identification Consortium (WLIC). WLIC is a member-based consortium working cooperatively with USDA and the Wisconsin Department of Agriculture (DATCP) to implement the NAIS in Wisconsin. Following the standards outlined in the original USAIP (now NAIS) WLIC and its members have provided outreach to producers and have implemented the premises registration system and are currently implementing the state component for animal tracking as outlined in the NAIS strategic plan.

WLIC and its members have actively participated in the development of the US Animal Identification Plan and in general support the NAIS strategic plan and program standards outlined by USDA. A national animal identification system can only be implemented if **federal, state and industry work cooperatively together** and lay aside commercial differences. The task of implementing the NAIS is an enormous undertaking and **NO one** single group or entity can achieve implementation of NAIS by themselves. It was long recognized in the USAIP that a national animal identification system needs to be focused on protecting animal health and be accessible to animal health officials at all times. Due to competitive advantages or disadvantages, commercial uses of animal identification should be left outside of NAIS and left to be administered by individual industry groups. Due to different state health requirements and species differences, state and species differences are best addressed at the regional level **using nationally established standards**. Industry plays a key role in the identification of livestock and collection of information, while state and federal regulatory agencies administer compliance, state and national databases.

WLIC and its members have been successful in Wisconsin because of the cooperative effort involving all stakeholders.

I support the overall objectives of the NAIS and the Program Standards to:

- ☐ Establish a uniform national standard for uniquely identifying locations that produce, manage, and hold livestock.
- ☐ Establish a uniform national standard for uniquely identifying individual animals and a group or lot of animals as they move through the marketing chain.
- ☐ Establish a uniform national standard data management system for recording the movements of individual and lots of animals at change of ownership, interstate movement, and commingling with other owners livestock.
- ☐ Establish the ability to trace a diseased animal of concern from point of diagnosis through the marketing chain to herd of origin within 48 hours.

I support the five guiding principles of the Draft Strategic Plan and the Program standards establishing:

- ☐ Uniform data standards throughout the U.S. supporting premises registration, animal identification, and animal tracking.
- ☐ Coordination of NAIS with production management systems and marketing incentives.
- ☐ Mandated implementation for all livestock species.
- ☐ Cooperative efforts by industry and government to achieve 48 traceback.
- ☐ Secured, reliable and confidential information.

ANSWERS TO SPECIFIC QUESTIONS:

Does NAIS need to be mandatory:

Yes! The NAIS needs to be implemented initially voluntary, but with a definite date by which the program becomes mandatory. Without full or near full compliance the NAIS will only be as effective as

it weakest link. January 2009 should be the final date for full implementation, however individual components should be made mandatory prior to this date as outlined in the strategic plan. Since all states are currently operational with premises registration, consideration should be given to move the mandatory date for premises registration to an earlier date.

Compliance for identification:
For the NAIS to be effective producers must be required to identify animals either prior to moving into commerce or allow markets and exhibitions to offer identification as a service to producers. In order to maintain a level playing field between industry players, market and fair managers should not be held liable by law to enforce compliance and enforcement. Compliance and enforcement to rules should be left in the hands of state animal health officials. Although market and exhibitions could have the option to refuse unloading of animals that are out of compliance, participation by markets and exhibitions might be better served if they could provide a report to state animal health officials for producers out of compliance.

Tagging at markets:
Any entity including markets should be allowed to provide ID services as long as they meet USDA and state requirements for administering AIN ID devices.

Compliance/recording of direct sales:
In the cattle species recommendations it is outlined that the receiver or buyer is responsible for reporting animal movement while the seller is responsible for identifying the animal. The option exists for the seller to report movement as well. To ensure producers selling and buying livestock comply to the maximum extend possible there should be various options available to report animal movement. This can be achieved through internet based state systems, industry groups (DHIA's breed registries, any other third party service provider), or directly via paper.

Age limit for identifying animals:
As a minimum, animals should be identified before entering in commerce. It should be left to individual producers to decide on what timeframe prior to this would be more beneficial to identify animals. Producers participating in a breed registry program or a third party service could identify animals at birth as part of the service offered.

NAIS timelines:
USDA should accelerate the process for registering premises by requiring mandatory registration prior to 1/1/2007. Individual states have started establishing dates for mandatory premises ID (Wisconsin has established 11/1/2005 as a date for mandatory premises ID). Most producers and industry groups support USDA and states departments of agriculture to collect premises ID information and seems to be the least contentious issue in implementing the NAIS.

Species timelines:
For the NAIS to work, there should not be any exemptions in regards to compliance of species groups to certain components of the NAIS. For example all livestock species must register a premises by the same mandatory date. Using different timelines will create confusion with industry and producers in regards to implementation and does not support the uniform goal of a system with 48-hour traceback capabilities.

Data submission:
Electronic data submission is the most cost efficient. To ensure producers, markets, fair, and processing facilities can participate; all venues for data submission should be allowed, with incentives provided for electronic submission. This includes direct internet based data entry, paper submission, herd management software, or producers working through third party data providers. Wisconsin pioneered various venues for premises registration. Producers can register themselves directly online, fill in a paper form and mail to WLIC, work through approved third party service provider, and register through stations with internet access setup in county FSA offices. A state data collection infra-structure addressing regional needs and

allow for various options for data entry has proven to be very efficient and achieve the maximum amount of buy-in from stakeholders.

Confidentiality:
It is key confidentiality of the data is assured. Legislation needs to be passed that protects the animal health information from having to be released. Key information that needs to be protected revolves around producer location and contact information and animal movement from these locations. The use of this information for either public or commercial reasons should only be allowed with producer consent. Aggregate data that does not expose individuals could be made available.
States are proceeding with legislation to protect information associated with premises and animal identification. The same type of legislation needs to be put in place nationally.

Burdens associated with reporting information:
The cattle species group recommends that the receiver/buyer is responsible for reporting animal movement. Assuming buyers and receivers comply, this should provide the all premises locations needed for disease traceback. However producers that sell or ship animals should be encouraged to report move out events. Electronic options for data submission should provide for a seamless interface with minimum producer involvement and provide additional safeguards that movements are adequately reported.

Privately managed database
The proposed NAIS infrastructure allows for USDA and states to contract with private database managers. The Wisconsin Department of Agriculture contracted with WLIC to manage the state premises and animal ID database. Although WLIC is maintaining a privately managed database, the authority for collecting and storing premises and animal identification remains with the State Department of Agriculture. Premises registration and animal movement information is accessible to animal health officials at all times. To meet the 48-hour traceback objective and maintain international credibility any national privately managed database must meet USDA's needs and should be under the authority and oversight of USDA with industry input and accessible to USDA and state animal health officials at all times without cumbersome conditions.
Producers and stakeholders have voiced equal concerns about a publicly held national animal ID database as a privately held national animal ID database. For NAIS to be mandatory and animal ID data to be stored in a privately managed national animal ID database, stakeholders feel very strongly that the information can only be used for animal health purposes and cannot not be used for commercial purposes that may disrupt the current market balance.

Funding
Wisconsin producers have voiced strong feelings that the financial burden for implementing the NAIS should be placed on the consumers to the maximum degree possible. Producers have raised concerns that a privately managed database system without government oversight could lead to excessive fees passed back to the producer with no means to offset these extra costs. Under a publicly held system it is expected that these costs would be shared with the consumers, therefore adequate long term funding beyond the $33 million must be supplied to USDA and states to administer the NAIS.

Multiple systems
Having multiple national animal ID databases broken out by species would make compliance cumbersome and risk that the 48-hour traceback goal cannot be met. Producers or stakeholders managing different species should not be asked to submit data to multiple locations to comply with NAIS. The proposed information system infra-structure for one single national animal ID database which is supported by state databases and third party data providers is the most cost effective and efficient infra-structure method to achieve maximum compliance and address regional (state) differences.

Federal and industry systems
Unless all industry stakeholders can agree to a single privately held national animal ID system where no one entity holds a financial advantage, a publicly held national animal ID database should be available as well. This will provide stakeholders with a choice.

All species
Absolutely!

State level
A lot of focus has been placed on who manages the national animal ID database, however very little focus is placed on the task of collecting the data. Data collection is the task that will be hardest and most expensive to accomplish, it also cannot be separated from the database management issue. Stakeholders are very concerned in regards to the technology and costs associated with data collection. Due to regulatory differences (branding, non-branding, etc.) the current design of the data collection infrastructure that includes state managed databases must be maintained either under a public, or privately managed national animal ID database.

Curtailments Associated With Technology Neutral:
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. While technology neutral provides no leadership, guidance or incentive in the market place for infrastructure development. Technology neutral dictates that producers, marketing agents and packing plant managers must have all forms of ID equipment available just in case an animal shows up with a varying type of ID device. **Technology neutral only adds expense not effectiveness to the program.**

To maintain continuity of animal disease programs and reporting animal tracking data to the NAIS, I support the use of RFID technology in all livestock species as deemed effective and appropriate by the NAIS Specie Working Groups.

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