

# **USDA Proposes New Rule for Animal ID**

*Your comments needed today!*

Having dropped the plans for the National Animal Identification System (NAIS), USDA is back again for Round Two. The agency has proposed a rule that would require livestock producers, related businesses, and state agencies to incur significant expense tracking animals that cross state lines – all for the benefit of large Agribusiness.

## **Animal Traceability—A Solution in Search of a Problem**

Though less sweeping than the NAIS, the proposed animal traceability rule is still burdensome. And it's also a solution in search of a problem -- the USDA has failed to identify the specific problem or disease of concern. The real focus of the program is helping the export market. While the program will benefit a handful of large corporations, the costs and burdens will fall on producers, vets, sale barns, and States. These new regulations will harm rural businesses while wasting taxpayer dollars that could be better spent on the real problems we face in controlling animal disease, food security, and food safety.

**Cattle--**Along with new identification requirements imposed on all breeding-age cattle, the proposed rule would require identification and paperwork on calves and young cattle ("feeder cattle"), even though there's no evidence that such requirements will help disease control. In addition, veterinarians and sale barns will have to keep records for 5 years, even though many of these cattle will have been consumed years earlier, creating mountains of useless paperwork.

Producers will only be able to use brands or tattoos as identification if their States enter into special agreements. State agencies will have to build extensive database systems to handle all of the data, creating problems for States' budgets.

**Poultry--**Small-scale, pastured, and backyard poultry will be particularly hard hit by the proposed rule. While the large confinement operations will be able to use "group identification," the definition of the term does not cover most independent operations. Since thousands of people order baby chicks from hatcheries in other states, these birds cross state lines the first day of their lives. Even if the farmer or backyard owner never takes the bird across state lines again, they will have to use individually sealed and numbered leg bands on each chicken, turkey, goose, or duck to comply with the language of the proposed rule.

**Horses--**The proposed rule also requires that horse owners identify their animals before crossing state lines. Although most, if not all, horses that are shipped across state lines are already identified in some fashion, the proposed rule creates a new complication: Whether or not a physical description is sufficient identification will be determined by the health officials in the receiving state, leaving vets and horse owners struggling with significant uncertainty as they have to anticipate what will be allowed.

**Sheep, Goats and Hogs--**The draft rule also covers sheep, goats, and hogs that cross state lines, essentially federalizing the existing programs which have been adopted state-by-state until now.

**Please help protect farmers by submitting comments to  
USDA before December 9, 2011!**

*Details are on the back of this flyer*

## **TAKE ACTION: Submit Comments to USDA**

ONLINE: [www.regulations.gov/#!submitComment;D=APHIS-2009-0091-0001](http://www.regulations.gov/#!submitComment;D=APHIS-2009-0091-0001)

BY MAIL: Docket No. APHIS-2009-0091, Regulatory Analysis and Development PPD,  
APHIS, Station 3A-03.8, 4700 River Road Unit 118, Riverdale, MD 20737-1238

DEADLINE: December 9, 2011.

### **SAMPLE COMMENTS**

*Please include a personal story at the beginning of your comments so that it's not just a form letter. The personalization can be just a few sentences, but it does make a significant difference.*

Dear Secretary Vilsack:

I am a \_\_\_\_\_ (farmer, local foods consumer, backyard poultry owner, horse owner, etc.). I am very concerned that the proposed rule will \_\_\_\_\_ (not be workable for my farm; impose costs on my farmers that will then be passed on to me; make it prohibitively expensive for me to order baby chicks from out-of-state hatcheries; etc.)

I urge the USDA to withdraw the proposed rule.

If the export market would benefit from the proposed rule, as the agency claims, then the meat packing companies that export meat should pay the costs and offer economic premiums to livestock producers to encourage them to participate in a **voluntary** system.

The agency's analysis does not address the full costs of the program, and this is a waste of money at a time when both private and government resources are already stretched thin. The proposed rule is an unfunded mandate on state agencies, private businesses, and individuals.

At the very least, significant changes need to be made:

- Apply the requirements to breeding-age cattle only and exempt feeder cattle from all new requirements.
- Exempt all direct-to-slaughter cattle, both for custom and for retail sales.
- Recognize brands and tattoos as "official identification"
- Do not impose any new requirements for identifying poultry. There has simply been no showing that imposing new requirements on small-scale poultry operations is needed, while it will definitely cause significant harm.
- Provide that a physical description qualifies as an official identification method for horses without having to be approved by the health officials in the receiving State or Tribe.

Sincerely,

Name

Address, City, State Zip

***For more information, go to  
[www.FarmAndRanchFreedom.org](http://www.FarmAndRanchFreedom.org)***