

## The National Animal Identification System (NAIS)

The U.S. Department of Agriculture (USDA) is currently in the process of implementing the National Animal Identification System (NAIS) through the States. NAIS is designed to identify all livestock animals and poultry and track them as they commingle with animals other than herd mates from their premises of origin. When the program is fully implemented, the USDA expects that NAIS will be able to identify all premises on which the animals are located and all animals that have had direct contact with a foreign animal disease or domestic disease of concern within 48 hours of discovery.

The USDA recently described NAIS as “one of the largest systematic changes ever faced by the livestock industry.” Despite the scope of the proposed program, the government has not conducted any scientific studies or epidemiological models to analyze the design or effectiveness of the NAIS. Rather, the USDA has relied on generalized statements that NAIS is necessary to protect the United States against an outbreak of animal disease and that it will help the export market.

Although the USDA repeatedly states that NAIS is now “voluntary” at the *federal* level, it is encouraging mandatory *state* programs through grants. The USDA’s stated goal is 100% participation by January 2009. The USDA continues to provide grants to the states, and the state cooperative agreements include meeting performance goals. As a result, several states have adopted, or are proposing to adopt, mandatory laws and regulations. Other states have used coercive methods and data mining to increase participation in so-called voluntary programs.

The NAIS is to be implemented in three stages. To reach the USDA’s goal of 48-hour traceback of **every** animal, each stage would ultimately need to be mandatory:

1. Premises registration: Every person who owns any livestock animal would have to register the premises where the livestock is held within the state. Livestock animals include cattle (beef and dairy), hogs, sheep and goats, chickens and other poultry, horses, bison, deer, elk, alpacas, llamas and others.
2. Animal identification: There will be two levels of animal identification: individual animal and group or lot identification. Most animals in the program would need to be individually identified with a unique 15-digit number. Animals would either be implanted with a microchip or tagged with a radio frequency device, or otherwise physically identified. The tag will have to bear the entire 15-digit number, with the number easily read. For at least some species, radio-frequency identification devices would be required.

Group or lot identification could only be used where groups of animals are managed together from birth to death and not commingled with other animals. In practice, only large confinement producers of poultry and swine would be able to avail themselves of this exception to the individual tagging rule. If animals do not meet the requirements for group identification, they will have to be individually identified.

3. Animal tracking: Every time a tag is applied, a tag is lost or an animal needs to be re-tagged, an animal is killed or dies, or an animal is missing, the event would have to be reported to the government within 24 hours. “Commingling events” will have to be reported, including both public and private sales, regional shows and exhibitions.

The NAIS will remain a problem until Congress and the state legislatures adopt legislation barring the agencies from implementing mandatory or coercive programs.

## The National Animal Identification System: Key Issues

The NAIS was developed by large agri-businesses, technology companies, and government bureaucracies, without involving the hundreds of thousands of people who own livestock animals and who will be directly affected. The NAIS will cause a variety of issues:

- Massive intrusion into people's lives: individuals will have to provide detailed information about their property, businesses, and their own movements to government and private databases;
- Burden on property rights: the premises registration number will attach to the land forever, and people's rights to manage their land and animals will be restricted;
- High costs: registration, tagging, and reporting all carry costs in both time and money;
- Loss of small farmers and ranchers: many will be unable to afford the program, or unwilling to accept the government intrusion;
- Damage to the economy: businesses that rely on small farmers, such as sales barns, supply stores, and even tourism, will be harmed;
- Reduced choices and increased costs for consumers;
- Violation of many Americans' religious beliefs; and
- Increased government bureaucracy and waste of taxpayer dollars.

Even though USDA is advocating this program, it has not performed a cost analysis of the program. Costs for similar programs in other countries are estimated to range from \$37/head to \$69/head. With over a hundred million cattle and millions of other livestock animals in the United States, the NAIS will likely cost producers, businesses, and taxpayers tens of billions of dollars.

The NAIS will not provide benefits to justify these costs. The stated purpose of the NAIS is to provide 48-hour traceback to address animal disease. But the NAIS does not address the critical issues for disease prevention and control:

- the causes of disease, especially differences in management;
- the vectors of disease transmission, including wild animals, insects, and imports;
- testing for disease, including tests for Mad Cow and other food-safety issues; and
- the unique issues posed by each species and each disease

The proponents of NAIS also ignore the alternatives for tracking animals through lower-cost and less intrusive programs.

Contrary to claims, the NAIS will not protect against bio-terrorism. Terrorists are unlikely to target hobby animal owners and small farmers. Microchips are vulnerable to cloning and computer viruses. The type of microchip specifically recommended for horses and cattle, the ISO microchip, is designed to be reprogrammable, so anyone can easily change the numbers. The large databases will provide an easy target for hackers. Indeed, even without intentional tampering, the large databases will be unmanageable, as has already been found in Australia.

The final stated justification for the NAIS is to improve the export market. However, there are better ways to reach agreement with Japan and other foreign countries, including allowing those meat packers who wish to export beef to test their beef for BSE. If tracing is a market benefit, let the market implement it, not a mandatory government program using our tax dollars. Any such program should be voluntary, non-coercive, allow for true competition, and paid for by the participants.