

April 7, 2017

President Donald J. Trump
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

The Honorable Michael Young, Acting Secretary
Animal and Plant Health Inspection Services
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

Dear Mr. President and Acting Secretary Young:

The undersigned organizations request the United States Department of Agriculture (USDA): 1) immediately halt any further action toward expansion of the existing Animal Disease Traceability (ADT) program; 2) cancel the scheduled public meetings scheduled for April and May; and 3) extend the written comment period to allow a minimum 120 days for producers to comment on the effectiveness of the existing ADT program.

The ADT program was instituted after massive public opposition convinced the USDA to withdraw its plans for an intrusive electronic tracking program called the National Animal Identification System (NAIS). The existing ADT program was put in place in 2011 and has been functioning successfully.

Yet USDA now appears poised to expand the program, moving toward a version that looks far more like the discredited NAIS approach. Not only do we believe that this is not a positive approach, but it certainly does not warrant the urgency and extravagance of the agency's hastily planned public meetings, which will likely prove ineffective because of short notice and poor timing on the part of the agency.

The notice given for these meetings indicate that their purpose is to receive input on the current Animal Disease Traceability (ADT) system. That statement is misleading at best, as a review of documents posted on April 6, 2017 clearly indicate that USDA intends to resuscitate its march towards a full, government mandated electronic identification system – a concept which has been repeatedly rejected by producers across the country.

Additionally, we take issue with the timing and scheduling of these meetings. The first notice was published on March 21, 2017 – only 21 days before the first meeting is scheduled to be held. Although the express purpose of these meetings is to address the implementation and administration of the agency's formal ADT rulemaking, there does not appear to be any public notice regarding these meetings in the *Federal Register*. Further, the April through May timeframe for the meetings falls during the most critical time of year for many cow/calf

producers. Cattle producers affected by these meetings will be unable to attend because of calving, branding, artificial insemination and moving cattle to summer pasture. Requesting producers to leave their operations for a full day for poorly noticed and ill-planned meetings right in the middle of the critical spring work confirms a severe lack of understanding by USDA of the realities facing United States livestock producers.

Because it will be difficult for many producers to participate in all-day meetings at this time of year, we believe the agency's hastily conceived meetings will be a waste of time and a waste of tax dollars. This effort flies in the face of the presidential directive that agencies reduce their expenses. In addition, the intention to create new regulatory requirements for animal ID contradicts the directive to reduce regulatory burdens on industries. Strangely, this attempt to widely expand industry regulation comes while USDA does not yet have a confirmed Secretary of Agriculture.

In order for USDA to seek guidance from producers regarding their experience with the existing ADT framework and the effectiveness of its implementation, we recommend a minimum 120-day comment period to collect comments and input from producers across the country. We feel that those comments will better inform USDA about producers' views regarding an expanded program without the unnecessary expense and ill-conceived logistics of these planned meetings.

We remind USDA that in 2009, as USDA held listening sessions and took public comment while still contemplating the NAIS program, the agency received tens of thousands of comments overwhelmingly in opposition and more than 85% of the comments offered at the listening sessions were opposed.

USDA received a clear message from United States cattle producers that the NAIS program – which this expanded ADT plan appears to mimic – was not acceptable. We do not see any changes in the cost-benefit to producers and we do not see evidence that producers' feelings towards an expanded ADT program has changed in any way.

For all the foregoing reasons, we request USDA to stop all action directed toward the expansion of the existing ADT program, cancel all the public meetings scheduled for April and May, and extend the comment period to allow for a minimum of 120-days of substantive, written input from cattle producers across the country.

Sincerely,

Farm and Ranch Freedom Alliance
R-CALF United Stockgrowers of America
South Dakota Stockgrowers Association
Western Organization of Resource Councils