



July 30, 2017

Re: Animal Disease Traceability

Dear Dr. Geiser-Novotny and Mr. Hammerschmidt:

The Farm and Ranch Freedom Alliance (FARFA) submits these comments in addition to the letter submitted earlier today on behalf of ourselves and 37 other organizations. These supplemental comments are based on the discussions at the Ft. Worth meeting earlier this month, which I attended as a representative of FARFA and our members.

First, to re-iterate what I said at that meeting: traceability is not the same thing as requiring a specific form of identification and paperwork. Traceability, as that term is used in plain English, is an important tool in addressing animal disease outbreaks. But it can be accomplished in many different ways.

Moreover, it is not the only tool in addressing outbreaks. Prevention of such outbreaks through strong import controls and healthy animal management should be the agency's top priority. As part of that effort, producers who keep their animals on pasture, using high-quality nutrition and low-stress management systems, should be supported and encouraged by the agency. Traceability programs such as mandatory electronic ID that impose disproportionate costs on small and pasture-based producers are counter-productive when viewed from the perspective of animal health as a whole.

Second, as stated by one attendee at the Ft Worth meeting, there is an "inevitable mixing of disease and trade issues." The speaker made this statement in support of the agency's approach of including the costs of lost trade as part of the "costs of an outbreak." But that is both inaccurate and inappropriate. Trade gains and losses are the result of extremely complex international relations, and are not properly treated as an animal health gain or loss.

In addition, the costs of lost exports are not imposed on all producers. Both the benefits of exports and the losses when export markets are limited fall primarily on a handful of businesses: meatpacking companies, feedlots, and certain large, specialty producers. The majority of livestock producers, who own relatively small numbers of livestock and have no direct connection to the export market, suffer few losses. Indeed, for producers who sell direct-to-consumer, the historic pattern has been that disease outbreaks such as swine flu actually improve these producers' markets, as consumers flock to a source they can trust. Imposing an expensive traceability program on producers based on the false belief that everyone benefits from the export markets is inappropriate on multiple grounds.



Third, the discussions repeatedly switch focus. The agency appears convinced that it must design a single traceability system to fit all needs, from Bovine Spongiform Encephalopathy (BSE) to Foot and Mouth Disease (FMD). Yet that ignores important differences. For example, when there is a BSE case, it is important to be able to find the birthplace of the animal. But the traceback can take several days or even weeks without causing significant animal health issues, since the disease takes years to develop. With FMD, in contrast, the birthplace is irrelevant – the agency needs to know where animals have been in the very recent past. And the timeline is far more compressed.

The agency appears to look at these two examples, and decide that the answer is that it needs to have all the information back to the birthplace within 48 hours. But no one has presented a situation in which there is such a need based on animal health.

In sum, our producers are willing and prepared to address true traceability needs relevant to animal health. We will oppose any attempt to impose an overly broad Animal ID system for marketing reasons.

Sincerely,

Judith McGeary  
Executive Director  
Farm and Ranch Freedom Alliance