

The National Animal Identification System: Overview of the Alternatives

The National Animal Identification System (NAIS) is intended to identify all premises on which animals are located, and all animals that have had contact with a disease of concern, within 48 hours of discovery. Proponents of NAIS have argued that multiple benefits could be achieved by such traceback. Yet all of the benefits can be achieved through alternative means, both at the federal and state level.

Alternatives for improving animal health

- ◆ Develop educational programs for animal owners. The susceptibility of animals to disease and the likelihood of transmission differ greatly depending on the conditions under which the animals are kept.¹ Animal owners should be taught how to prevent disease through animal management and biosecurity measures, and how to identify diseases requiring the intervention of a veterinarian.
- ◆ Encourage decentralization of the livestock industry. The Government Accountability Office (GAO) has found that that concentration of our food is a point of vulnerability.² Decentralization can be encouraged through reduced regulations on small producers and related businesses.
- ◆ Improve training for veterinarians in recognizing foreign and emerging animal diseases.³
- ◆ Develop a protocol for the use of rapid diagnostic tools in the field.⁴ Rapid diagnosis is critical to the containment of highly-contagious diseases without excessive slaughter of animals.
- ◆ Increase inspections of animals and agricultural products traveling into the U.S. and across state borders. For example, the Texas Department of Agriculture has estimated that there probably thousands of shipments that enter Texas in violation of Texas quarantine laws and regulations.

Alternatives for tracking disease outbreaks

- ◆ We already have significant existing mechanisms for tracking livestock: brucellosis program, scrapie program, tuberculosis program, brand system, sales and slaughter records, and producers' records. The GAO report on agroterrorism did **not** identify any deficiencies in current mechanisms for tracking animals.
- ◆ Conduct scientific modeling to identify high-risk situations and quantify important factors, such as the level of contagion, the means of transmission, and the severity of the diseases of concern. Use the results of the studies to develop tracking mechanisms that address specific concerns with specific types of livestock, rather than instituting one size fits all approach.
- ◆ Analyze the costs and benefits of minor modifications to existing programs and alternative programs, such as a "book-end" system (i.e. no tracking of movements) that uses non-electronic means of identification when the animal enters the stream of commerce.
- ◆ Require a cost-benefit analysis of NAIS so that it can be compared to the alternatives.

Alternatives for improving food safety

- ◆ The USDA itself has stated that NAIS is **not** a food safety program. Under NAIS, the tracking ends when the animal is killed at the slaughterhouse. But most food-borne illnesses occur because

of poor practices after slaughter, which cause contamination by bacteria such as salmonella, e. coli, and campylobacter, or the Norwalk viruses.⁵ NAIS will do nothing to address these issues.

- ◆ Increase standards and inspection of food processing facilities.
- ◆ Increase testing for BSE, or Mad Cow Disease. USDA's current plans call for testing only one out of every thousand (1,000) cows that are slaughtered.

Alternatives for communicating with animal owners

- ◆ We have multiple existing mechanisms: public service announcements on TV, radio, and in newspapers; posting notices at relevant locations, such as feed stores; email distribution of news releases.
- ◆ Improved communication could be achieved through a voluntary email and telephone notification system. Individuals could provide contact information and select counties for which they would receive notifications, without providing information on their homes or animals. In the event of an outbreak, an automatic email or phone message could be sent to the enrollees in the affected counties. This would be a low-cost mechanism that would address the communications issue without burdening people's property and privacy rights.

Alternatives for improving the market

- ◆ USDA already has a program to provide age and source verified products for both the domestic and export markets. The Process Verified Program (PVP) provides government certification for suppliers of agricultural products or services that meet the applicable standards. The program allows the suppliers to market themselves as "USDA Process Verified."
- ◆ Implement Country of Origin Labeling and "Buy Texas" programs. The U.S. imports more beef than it exports, so emphasis should be placed on the domestic market.
- ◆ Address concerns of other countries through the PVP, increased testing for Mad Cow Disease, and heightened standards for export facilities. All measures to address export market issues should remain entirely voluntary and applicable only to those who choose to be part of the commercial export chain.
- ◆ Market programs should not be subsidized by government tax dollars. Government funding of the program distorts the market forces and introduces inefficiencies.

¹ The health problems caused by confinement or industrial management systems have been well documented in the scientific literature. See, e.g., D. Herenda and O. Jakel, *Poultry Abattoir Survey of Carcass Condemnation for Standard, Vegetarian, and Free Range Chickens*, CAN. VET. J. 35(5):293-6 (1994); T.G. Nagaraja and M.M. Chengappa, *Liver Abscesses in Feedlot Cattle: A Review*, J. ANIM. SCI. 76(1):287-98 (1998); T.G. Nagaraja, M.L. Galyean, and N.A. Cole, *Nutrition and Disease*, VET. CLIN. N. AM. FOOD ANIM. PRAC. 14(2):257-77 (1998). A recent report indicates that the spread of avian flu, including the greatly-feared H5N1 virus, is due to the conditions in confinement poultry operations. Genetic Resources Action International ("GRAIN"), *Fowl Play: The Poultry Industry's Central Role in the Bird Flu Crisis* (Feb. 2006) (hereinafter "GRAIN Report").

² See United States Government Accountability Office, GAO-05-214, *Homeland Security: Much is being done to protect agriculture from a terrorist attack, but important challenges remain* (Mar. 2005) at p.1 ("GAO Report").

³ GAO Report at p.6

⁴ GAO Report at p.6.

⁵ See Centers for Disease Control and Prevention, www.cdc.gov/ncidod/dbmd/diseaseinfo/foodborneinfections_g.htm#mostcommon.