



Stop Mandatory Electronic Animal ID

For decades, multinational meatpacking corporations and high-tech companies have pushed mandatory electronic identification for livestock, claiming that it's an animal health measure and supports food safety – but neither is true. **The real story is that it is to promote international trade, thus maximizing the meatpacking companies' profits, while the high-tech companies will make millions selling tags, readers, and all the related infrastructure, all at the expense of farmers and ranchers.**

The proposal for electronic ID was defeated in 2010 by massive opposition from organic farmers, conventional ranchers, sales barn owners, homesteaders, and consumers who want to buy from American producers.

But Agribusiness and its allies in the USDA are now trying to bring it back. Early this year, USDA published a proposed rule to mandate electronic ID for cattle. **Despite the fact that the vast majority of comments the agency received were opposed to the proposal, USDA appears to be planning to finalize it early in 2024.**

We need Congress to take action to stop this unnecessary and damaging plan.

Background: The 2013 Animal Disease Traceability rule requires that all dairy cattle and adult beef cattle that cross state lines have some form of “official identification.” The rule specifically provides that people can use either electronic or low-tech, traditional forms of ID.

The USDA's new proposed rule would make electronic ID the only form of official ID allowed for cattle crossing state lines under the ADT rule. The proposed rule is an illogical, ineffective proposal that will unfairly burden small-scale farmers and ranchers.

- 1. The agency has failed to show a need to impose more expensive requirements:** Prior to imposing new regulations and costs, an agency should conduct an analysis to determine the need and whether the new requirements actually address that need. Despite numerous requests, the USDA has failed to conduct such an analysis for mandatory electronic animal ID.
- 2. The proposed rule disproportionately harms small farmers and ranchers:** Moving to a completely electronic ID system carries significant costs, not only from the cost of the tag itself but also associated infrastructure costs. This impacts not only farmers, but also sales barns and large-animal veterinarians. Large corporate-controlled operations will not only benefit from economies of scale, but could structure their operations to avoid individual ID requirements altogether.

Consider what happened when Michigan implemented mandatory electronic ID for cattle on an intrastate basis in 2007. Over the next five years, the number of very small cattle farms in Michigan declined by 3%, even though nationally the number of such farms increased. And the number of very large cattle farms in Michigan increased by 35%, even though the number of such operations decreased nationally.¹ In other words, in the

real-world example of the impact of mandatory electronic ID in this country, the results show that it hurts small farms and increases consolidation.

- 3. It will be ineffective in improving animal traceability:** Based on the agency's own analysis, the proposed rule will be ineffective. The agency estimates that it will impact only 11% of cattle in the country. Yet an earlier congressional analysis concluded that 18% was too low of a participation rate to make traceability programs effective.ⁱⁱ

In addition, by increasing the number of digits in the ID number, the agency is actually increasing the probable error rate.ⁱⁱⁱ

- 4. It ignores the extensive stakeholder work that went into the Animal Disease Traceability rule:** The ADT rule, and in particular the decision to include low-tech traditional forms of ID, was the result of extensive work and negotiations among numerous stakeholders. In proposing to mandate electronic ID, the agency is acting contrary to the carefully negotiated consensus.

- 5. Mandating electronic ID undermines the goal of promoting a resilient food system:** If we want to build resilient, diversified supply chains, the federal government needs to take steps to avoid regulations and policies that are prejudiced against small- and mid-scale producers, such as mandatory electronic Animal ID.

The USDA has been told by numerous stakeholders for over a decade that mandatory electronic Animal ID is a solution in search of a problem, and one that will harm thousands of small farmers and ranchers across the country. The agency is not listening, and it is time for Congress to step in.

The solution is simple: Keep the 2013 Animal Disease Traceability Rule unchanged, allowing farmers and ranchers to identify their animal with traditional, low-tech forms of ID *or* electronic ID, depending on which works best for their operations.

Read more about the problems with mandatory electronic Animal ID in this letter, which was signed by 2,070 nonprofits, farms, ranchers, livestock businesses, and individuals:

<https://farmandranchfreedom.org/wp-content/uploads/2023/04/Sign-on-letter-opposing-mandatory-electronic-ID-April-2023.pdf>

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ⁱ This data is based on the USDA NASS Agricultural Census of 2007 and 2012.

ⁱⁱ Congressional Research Service, Animal Identification and Traceability: Overview and Issues (Nov. 29, 2010), Summary (emphasis added)

ⁱⁱⁱ See the analysis at pages 4-5 of FARFA's comments to USDA, which were joined by 2,070 nonprofits, businesses, and individuals: <http://bit.ly/Oppose-Mandatory-RFID-for-Cattle>