

ACTION ALERT
MEETINGS ON ANIMAL TRACIBILITY

Although USDA has backtracked on its plans for the National Animal Identification System (NAIS), the fight is not over yet! As announced in February, USDA is working on a new framework for animal traceability. USDA has stated that this new framework will apply only to animals that cross interstate borders and will emphasize low-cost identification methods. But Big Ag and Big Tech are pushing for a more expansive and expensive -- federal program, even as they also make plans to re-create NAIS at the state level.

The USDA is holding a series of public meetings on its new framework, and has announced three more during August: Madison, Wisconsin; Atlanta, Georgia; and Pasco, Washington.

TAKE ACTION
Come to the meeting and make your voice heard!

Wednesday, August 18
Crowne Plaza Madison
4402 East Washington Avenue
Madison, WI 53704

Friday, August 20
Doubletree Hotel Atlanta Airport
3400 Norman Berry Drive
Atlanta, GA 30344

Tuesday, August 24
Red Lion Hotel
2525 N 20th Avenue
Pasco, WA 99301

The meetings will take place between 8 am and 4 pm, and the USDA has more information posted at <http://www.aphis.usda.gov/traceability/meetings/index.shtml>

The morning will consist of presentations by government officials, followed by breakout sessions at tables based on species groups. After the small groups have reported back to the full audience, a USDA official will respond to written questions, and there may be an opportunity at the very end for oral questions or comments.

Below are a couple of suggestions to help you be effective:

- 1) Plan your written questions ahead of time. When the USDA official goes through the questions in the afternoon, if he doesn't actually answer your question, stand up and politely insist on an answer.

2) At the small group discussion, be prepared to be an advocate for your views and to politely disagree with the facilitator(s). If they claim that a consensus has been reached with an answer that you don't agree with, say so. At the end, one person from the table will report back to the full group. Let the spokesperson give his or her report, and then politely speak up to add any points that were covered by the group that were skipped.

For more information on the previous public meetings and USDAs proposed framework, visit the Farm and Ranch Freedom Alliance: <http://farmandranchfreedom.org/action-6-6-10>.

BACKGROUND

The USDA's new proposal was developed by a "Regulatory Working Group" (RWG) made up of five state vets and five tribal representatives. The proposal includes four performance standards, which set how quickly States and Tribes must be able to perform four activities:

1. The State where the animal is located must notify the State or Tribe where the animal of interest was originally identified: 95% within 1 business day
2. The State or Tribe where the animal of interest was officially identified must identify the "traceability unit" in which the animal was identified: 75% within 5 business days, with a later phase requiring 95% within 2 business days
3. The State where the animal is located must notify the State or Tribe from which the animal was last shipped: 95% within 7 business days, with a later phase requiring 95% within 3 business days
4. The State from which the animal was last shipped must identify the "traceability unit" from which the animal was shipped: 75% within 5 business days, with a later phase requiring 95% within 2 business days

Judith McGeary represented FARFA at both the Colorado meeting in May and the Texas meeting in July. Many farmers, sale barn owners, horse owners, and consumers also came, and we raised many concerns.

--What is the basis for the new proposal? While the performance standards are less stringent than NAIS was, they still lack a scientific basis. At my breakout table, a USDA vet stated that the performance standards were based on the experience of the state vets and regulatory officials. While experience is important, why is their experience prioritized over the experience of animal owners who deal with animal health every day? Before imposing any new requirements on animal owners, the agency needs to provide solid scientific and economic analyses to show why these steps are needed.

--Are performance standards the right approach? Should USDA be setting standards when it is far from clear how the States would be able to achieve them?

--There is still no analysis of where the real problem lies. Is it truly an animal identification problem? Or are the problems with traceability due to bureaucratic inefficiencies or other issues? On the issue of animal health, where exactly are the gaps?

--There is a continued assumption that electronic ID is the best approach. While USDA has committed to using low-tech methods for the framework, there are repeated references to progress over time, and every government speaker emphasized the benefits of RFID tags. I asked whether USDA intended to analyze the effectiveness of the program before moving towards electronic ID, pointing to the success of the scrapie program using non-electronic ID. In response, Neil Hammerschmidt said there were no such plans. Dr. Wiemers went further, and contended that, while non-electronic ID has worked for the scrapie program, it is not sufficient for tracing all movements. Yet the advocates of electronic ID continue to fail to show that it is needed or cost-effective.

In addition to the problems with the substance of the proposal, the public meeting also revealed problems with USDAs process in developing the new framework:

--The Regulatory Working Group (RWG), which wrote the new standard, was chosen after getting recommendations from industry. But, to our knowledge, no sustainable agriculture or small farm organizations were asked for recommendations. Yet again, Big Ag got to set the stage.

--While there were 10 people on the RWG, they created three subgroups. Only one subgroup wrote the standard. So the proposed performance standards were developed by just three or four regulatory officials.

--The proposal is confusing and unclear. For example, there is no written definition of traceability unit, and we've now heard three different definitions at three different public meetings. At the Colorado meeting, Colorado State Vet Dr. Roehr stated that it was a geographical unit and could be anything from the whole state to a set of counties to a county to an individual premises. At the Utah meeting, Montana State Vet Dr. Zaluski stated that the traceability unit was either a physical location or a group of animals. At the Texas meeting, Oklahoma State Vet Dr. Brewer stated that ultimately it is a premises. Three members of the RWG, with three different statements on what the term means!

How can the public provide input when the people who drafted the proposal can't even explain it clearly? How can we provide useful input without first getting answers about what the program is, how it will be implemented, its purposes and goals? The proposal is extremely ambiguous, but it appears to set the stage for traceability back to individual premises and ultimately RFID tagging of each animal. Is this USDAs intent? Or is it being driven by industry and the career bureaucrats who have spent more than a decade building NAIS? Right now, it's not clear.

Come to the meetings in Wisconsin, Georgia, and Washington, and make your

voice heard!

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