

Policy Statement: The National Animal Identification System

The USDA released its plan for implementing the National Animal Identification System (NAIS) on April 6, 2006. The NAIS will require all livestock producers to identify premises and electronically tag and track all livestock in the United States. The purpose of the NAIS is to rapidly address animal disease outbreaks such as BSE and Avian bird flu while securing foreign export markets. According to the USDA, full national participation in the program is expected by January 2009.

NOFA-VT opposes the mandatory implementation of all aspects of the NAIS. Although we recognize the need for sound regulatory measures to address animal health and safety, NOFA-VT believes that the NAIS is an unnecessary, ineffective and cost-prohibitive program.

The USDA asserts that a comprehensive national animal identification system is necessary for disease detection and subsequent eradication. The USDA, however, has failed to present evidence that current programs are inadequate to address animal disease outbreaks. The NAIS suggests that rapid animal tracking is necessary for disease detection and containment. However, established systems and processes for the surveillance of livestock and for the prevention, eradication, and control of livestock diseases currently exist. Contagious disease outbreaks can presently be addressed, identified, and contained through education/outreach, quarantine zones, testing, and monitoring. A centralized database monitoring all livestock premises and movements is subsidiary and unnecessary for locating and containing animal disease. Moreover, the broad-based approach of the NAIS does not address animal disease prevention and food safety. Rather than spending federal and state resources on animal identification and tracking measures, NOFA-VT encourages the implementation of novel and proactive programs that specifically focus on animal health and safety. NOFA-VT believes that the NAIS is unnecessary and duplicative as there are existing programs for animal disease identification, surveillance, and eradication that are adequate, less expensive, and effective at addressing animal health and safety.

Additionally, the uniform and mandatory procedures of the NAIS fail to recognize various agricultural production systems. The conditions under which animals are raised largely influence disease susceptibility and spread. Scientific research and literature has demonstrated the variety of health problems caused by confinement and industrial management systems.¹ Many confined poultry operations create ideal conditions for disease and transfer, whereas, pastured poultry operations are less likely to contract and spread disease since the animals are exposed to space, sun, air, and water. The NAIS, however, attempts to apply the same fees and regulations despite the differences among agricultural systems.

Likewise, since the costs of implementing the NAIS will uniformly fall on all producers, the program will likely be both time and cost-prohibitive for many small farmers. Although many large commercial operations may absorb the costs of this program the NAIS will place a heavy burden on individuals and smaller operations as a result of economies of scale. Additionally, since the proposed NAIS allows for group identification, larger production systems retain the

¹ See, e.g., Cravener, T.L., W.B. Roush, and M.M. Mashaly, *Broiler Production Under Varying Population Densities*, POULT. SCI. 71(3):427-33 (1992); M.R. Baxter, *The Welfare Problems of Laying Hens in Battery Cages*, VET. REC. 134(24):614-19 (1994); 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)

benefit of purchasing one animal id tag for a group of animals. In contrast, small producers with diverse animal breeds and types will be required to purchase individual tags for each animal species. As a result, the NAIS may be more costly for smaller, diverse operations, potentially forcing them out of business and creating resulting effects on consumers through decreased product diversity.

Finally, the USDA has also stated that the NAIS is necessary to secure the U.S. export market. NOFA-VT believes that this marketing goal does not support the necessity of a nationwide mandatory program. A voluntary program would sufficiently address the issue of both domestic and international export markets. It is unnecessary to require that every livestock animal be registered, tagged, and tracked in order to secure markets.

The state of Vermont has a rich agricultural history and landscape of diversified farms. NOFA-VT supports this agricultural diversity both in Vermont and throughout the United States. NOFA-VT believes that safe and quality production and management practices are the primary methods of disease prevention and transfer. We have sustained a strong commitment to supporting decentralized, local food systems that emphasize agricultural and biological diversity. The proposed NAIS, with its homogenous application, seriously threatens the future of diversified agricultural operations.

NAIS Resources

NOTE: The links below are intended to provide more information on the issues surrounding the National Animal Identification System. NOFA-VT does not necessarily endorse the views represented.

[APHIS \(USDA\) NAIS Homepage](http://www.usda.gov/nais)

www.usda.gov/nais

[Comments on NAIS "Draft Program Standards" and "Draft Strategic Plan"](#)

Mary Zanoni, Feb 6, 2006

[NoNAIS.org: Protect Traditional Rights to Farm](http://nonais.org/)

<http://nonais.org/>

[Texas Organic Farmers and Gardeners Association](http://www.tofga.org)

www.tofga.org

[Northeast Organic Farming Association, Massachusetts](http://www.nofamass.org)

www.nofamass.org

[Fowl play: The Poultry Industry's Central Role in the Bird Flu Crisis'](http://www.grain.org) GRAIN, February 2006.

www.grain.org

[Dead Birds Dont Fly: An Avian Flu Primer for Small-Scale Farmers](#) By Institute for Agriculture and Trade Policy (IATP), March 2006.

[Industrial Animal Agriculture the Next Global Health Crisis?](#) By Danielle Nierenberg, Worldwatch Institute and Leah Garcs, World Society for the Protection of Animals (WSPA), 2004.