

NAIS Business Plan Comments

Submitted through a cooperative effort of the participants
NATIONAL INSTITUTE FOR ANIMAL AGRICULTURE ID-INFO EXPO 2008
April 3, 2008
Indianapolis, Indiana

**ID-INFO WORKSHOP 2008 has been facilitated by
the National Institute for Animal Agriculture**

*Views presented in this report represent the view of
the participants of ID-INFO WORKSHOP 2008, and
do not necessarily represent the views or positions
of the National Institute for Animal Agriculture*



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National Institute for Animal Agriculture

The mission of the National Institute for Animal Agriculture (NIAA) is to provide a forum for building consensus and advancing solutions for animal agriculture and to provide continuing education and communication linkages to animal agriculture professionals.

The organization is dedicated to programs that: work towards the eradication of diseases that pose risk to the health of animals, wildlife and humans; promote a safe and wholesome food supply for our nation and abroad; and promote best practices in environmental stewardship, animal health and well-being.

ID-INFO WORKSHOP 2008

True to the mission of NIAA, the organization has organized five successful ID-INFO EXPOS to facilitate the sharing of ideas and to enable the development of consensus across the industry on the critical topic of Animal Identification. Following ID-INFO EXPO 2007, the decision was taken by the ID-INFO Planning Committee to modify the format of the meeting to a more interactive and collaborative format in order to review the USDA Draft NAIS Business Plan and to provide industry comments to USDA within the established comment period (ending on April 15, 2008).

The agenda for ID-INFO WORKSHOP was presented as a combination of presentations by USDA personnel, industry panel discussions and interactive (small group) workgroup sessions. The specific agenda is attached in Appendix 1 to this paper.

Over 170 individuals, from production agriculture to federal, state and local governments, livestock and breed associations, private industry and academia participated in the Workshop. At the conclusion of the Workshop, the stated goal was to prepare this consensus document that represents the voice of the 170 participants in regards to the scope, direction and vision of the USDA Draft NAIS Business Plan. To facilitate the development of this paper, the Committee Chair, Vice Chair and the leaders of the panel discussion and Workshop sessions circulated and refined extensive notes and direct participant comments to put forth this document. From there, the consensus document was drafted and distributed to all attendees of the meeting, soliciting further input and comments. From these final comments, the completed document,

reflected herein, was compiled and submitted to USDA on April 15, 2008. It should be noted that this document does not contain an exhaustive review of all comments, rather broad consensus views that were put forth at the Workshop. Participants, whether their views were held are part of the broader consensus or not, were encouraged to directly submit their comments to USDA as part of the open comment period for the Business Plan draft document.

ID-Info Planning Committee:

Chair: Glenn Fischer, *Allflex USA, Inc.*

Vice Chair: Victor Velez, *California Department of Food and Agriculture*

John Braly, *Deatron Fearing*

Amelita Facchiano, *NIAA Individual Member, Chair of the NIAA Equine ID Committee*

Dr. Mary Giddens, *NIAA Individual Member, Vice Chair of the NIAA Equine ID Committee*

John Heller, *Colorado Department of Agriculture*; Colin Foster, *Y-TEX Corporation*

Dr. Robert Fourdraine, *Wisconsin Livestock Identification Consortium*

Ron Miller, *Pennsylvania Department of Agriculture*

Dr. Boyd Parr, *Clemson University Livestock & Poultry Health Department*

Glenn Smith, *AgInfoLink USA, Inc.*

Workshop Speakers

Bruce Knight, *U.S. Department of Agriculture Under Secretary for Marketing and Regulatory Programs*

Neil Hammerschmidt, *USDA/APHIS/VS*

Panel Participants

State Panel:

Moderator: Victor Velez, *California Department of Food & Agriculture*

Dr. Dave Fly, *New Mexico Livestock Board*

Melissa Garrett, *West Virginia Department of Agriculture*

John Heller, *Colorado Department of Agriculture*

Kevin Kirk, *Michigan Department of Agriculture*

Gary Wilson, *Ohio Department of Agriculture*

Industry Panel:

Moderator: Glenn Fischer, *Allflex USA, Inc.*

Marvin Shurley, *American Meat Goat Association*

Dr. Ashby Green, *National Cattlemen's Beef Association*

Adam Griffin, *iDairy*

Kerry Thompson, *American Horse Council*

Dr. Patrick Webb, *National Pork Board*

Dr. Cindy Wolf, *University of Minnesota*

Information Systems Panel:

Moderator: Glenn Smith, *AgInfoLink USA Inc.*

Dr. Michael Coe, *Global Animal Management*

Dr. Robert Fourdraine, *Wisconsin Livestock Identification Consortium*

Adam Griffin, *National FAIR*

Mark Shaw, *Micro Beef Technologies Ltd.*

Steven Smith, *DHI-Provo*

Workshop Discussion Group Leaders:

Glenn Smith, *AgInfoLink USA Inc.*

Boyd Parr, *Clemson Livestock Poultry Health*

John Heller, *Colorado Department of Agriculture*

Dr. Robert Fourdraine, *Wisconsin Livestock Identification Consortium*

NAIS Business Plan Comments

On behalf of the 170 attendees of NIAA's ID-INFO WORKSHOP 2008, this paper, respectfully submitted to USDA under established public comment guidelines, we submit the following eight comments to the USDA Draft NAIS Business Plan. In addition, in light of the release of the AMS Business Plan to Advance NAIS, and its comments regarding use of NAIS for providing "safe harbor" for NAIS participants, a final comment will be added relative to this topic.

1. There remains broad industry support for continued funding of NAIS; USDA needs to implement the plan as outlined and follow the published target dates and program elements.

Despite perceived inconsistencies on the part of USDA in implementing the NAIS plan (including the reversal of the original mandatory participation element and delays in program implementation) there remains a broad sense of support for continued funding of NAIS. The USDA Draft NAIS Business Plan brings the program back into focus and provides a generally accepted framework for execution of the plan. Continued progress, however, will not be achieved without the continued funding support and necessary resources for this program.

The stated goals of the Business plan are seen as achievable for certain species groups – Swine, Goat and Sheep in particular are seen as groups that can meet the current target dates. The bovine targets, however, are not seen as realistic for beef cattle, and, although dairy producers generally accept the need for the system, specific goals are also seen as problematic under the current voluntary system.

2. For the NAIS system to reach its stated goals, timeframes for mandatory implementation need to be reconsidered.

When NAIS was introduced with a logical timeframe and a mandatory implementation schedule, there was, as expected, push back from some segments of industry. By reversing their position, however, USDA has created a great sense of doubt in the focus of the program and its will to implement, and thus has made it more difficult to implement the plan.

The general feeling, across most species groups and stakeholders, is that to effectively and efficiently eradicate disease, the system must be mandatory. For specific segments, such as the swine industry, good progress has been made (approximately 70% of estimated swine premises are reported as registered to date), but the industry sees the need for the system to be mandatory to get full participation. The dairy cattle sector has also seen good progress in the

adoption of RFID (albeit not the NAIS 840 tag, but the official ISO RFID manufacturer coded tags), yet sees mandatory as a necessary step. The sheep industry also noted that uptake is enhanced by mandatory implementation of the system.

The reinstatement of mandatory implementation dates, as per the previous USDA plan, would clearly give industry the opportunity to implement the plan on the current voluntary basis, but also would provide the firm knowledge and guidance that failure to implement the plan to protect our national herd is not an option.

3. Focus of plan must remain on goal of 48-hour disease traceback, while respecting the needs and practices of all stakeholders.

The focus on the plan needs to provide a stronger overall focus on the key goal of 48 hour traceback and overall disease control. In doing so, the plan needs to focus on satisfying the need of epidemiologists at a time of a disease outbreak and the ultimate requirement of the NAIS system of allowing for rapid response to disease management incidents. As such, consideration must be given to clear access to data and facilitation of animal traceback activities.

The NAIS system must not only incorporate steps for implementation recognizing individual species group needs, but must also consider the relevant differences in husbandry, identification, marketing and legal requirements of the state stakeholders. Programs that have developed under the voluntary implementation of NAIS are highly varied, and state-to-state and species-to-species variations must now be considered. An example here comes from the discussion of group-lot ID: the swine industry currently uses this tool quite effectively for swine moving within a production system as defined by CFR, and is so recognized; the sheep industry sees opportunity to also use group-lot effectively in some situations and should be given consideration; whilst the use of group-lot in cattle is seen as attractive, but more challenging, given existing movement practices for animals within the industry which would threaten the integrity of group-lot movements.

To achieve the goals of NAIS, USDA must foster greater collaboration with each species working group, states, industry partners, and ATDs to ensure full recognition of individual segment logistics and preferences, and work cooperatively to achieve the goals of NAIS, recognizing each segment's unique operational contribution. Specifically, work to incorporate specific ID programs that are proven to work to meet the goals of the program (such as recognition of the Scrapies program under NAIS and working cooperatively with existing Brand State

infrastructure/resources). Additionally, consideration should be given to formalizing the use of Premises Identification Numbers (PINs) on health papers and IMRs... this would decrease the time for disease traceback.

Under the voluntary phase, market drivers have been the critical element driving adoption. These drivers, which have been supported in some areas through producer incentives (such as highly effective device rebate programs), should be directly supported by USDA. As participation increases, such drivers may become less relevant, and thus the aforementioned timeframes to provide for mandatory implementation will complete the task of providing for full participation.

4. Technology neutrality is problematic in executing the plan; USDA must respect the direction of the Species Working Groups in determining allowable ID devices for recognition as official ID devices.

There is a clear need for consensus on devices used under the NAIS program; with current USDA messaging (for example, relative to inclusion of visual devices and recognition of brands under COOL “safe harbor” through the use of a recognized 840 device), program managers and states are beginning to recognize devices that, whilst proven to work in a “closed loop” environment, create many infrastructure problems on a consolidated basis. The species working groups have made clear the specific recommendations for identification devices in full consideration of not only one segment of their industry (such as cow-calf producers as part of a broader beef industry) but in consideration of the requirements of the entire industry, including key concentration points (such as auctions, order buyers, feedlots and packer/processors in the beef industry). Harmonization around these species working group recommendations is seen as critical for the ultimate success of NAIS. Previously, USDA has supported these standards (January 17, 2007 APHIS Stakeholders Announcement), where Under Secretary Knight, referencing the ISO 11784 and 11785 standards noted, “These standards are imperative so industry partners in NAIS can be assured one reader can scan and successfully read all AIN tags that have RFID technology”.

Much of the specific concern relative to the problematic nature of technology neutrality comes from the cattle industry. Michigan, for example, has adopted the Cattle Working Group recommendation of using only RFID devices, and will not accept other (non-RFID) identifiers moving forward. The broader Dairy industry, as represented by iDairy (a consortium of the Holstein Association, Jersey Association, National Milk Producers Federation, National DHIA, Dairy Calf & Heifer Association and the National Association of Animal Breeders), has also

supported the exclusive use of RFID (and has expressed support for mandatory implementation of the plan). Much of the rationale of position statements such as these focus on the inability of key concentration points to manage the sighting, recording and reporting of multiple styles of identification devices; consider this – how could a livestock market be expected to read, record and report identification devices in a given lot of cattle that would include brands, varied RFID and visual identification devices (such as plastic and metal tags), tattoos and brands? The Cattle Working Group clearly understood this, and made the firm recommendation of ISO RFID – USDA should respect this input, and respect the need for good data being brought into the system (as opposed to manually recorded 15 digit numbers).

In the Sheep Working Group, there is a strong desire to consider the existing USDA Scrapies program tags, which have served the industry well for 7 years. The great concern here stems from the obvious potential for a high frequency of transposition errors in manually recording a 15-digit number (a concern that would be valid across all species groups).

Several segments have also expressed concern regarding USDA’s foreshadowing the sunseting the official recognition of non-840 RFID device (known as “manufacturer coded” tags). With costs of 840 tags being higher than the manufacturer coded tags (due to specific printing and logistic requirements tied to 840 tags), there is no desire for producers to bear this additional cost given that no economic advantage can be achieved with the 840 tag over the manufacturer coded tag. Solutions to this issue are already in play in the market: direct subsidies underwriting the some of the cost of the 840 tag and USDA provision of 840 RFID tags for disease programs have resulted in a large percentage of the 3.6 million 840 tags currently in the market. This, coupled with the current policy of accepting manufacturer coded tags into the system will provide for the broadest level of participation.

5. USDA must continue to support the development of the market Infrastructure needed to execute the plan.

The clear understanding by USDA and industry that development of market infrastructure is critical to the execution of the plan must continue to be a strong focus and must continue to receive strong development and financial support from USDA. The continued investment in critical e-systems for harvesting of identification and other relevant information that works at the “speed of commerce” is seen as an important priority across the industries. Products such as the development of the eTB, eBrucellosis and eICVI systems are good examples of positive contributions in this regard... similar efforts across all species groups should be encouraged, and should include cost share or loaner programs to allow practitioners and cooperators to access this technology without having to fully bear the cost of adoption.

In addition to this, the need to develop a clear protocol for harvesting and reporting of termination records needs to be fully vetted as part of the plan implementation... currently, the recording and reporting of termination records is unclear.

6. Further effort must be expended to ensure proper data collection standards.

The continued development and consolidation of standards for data collection must be reinforced across all segments to ensure efficient, accurate and timely transfer of data across all stakeholder systems. The reporting of identification numbers must be efficiently and accurately harvested into databases, and this can only be done through proper standards for ID devices, data collection devices and database elements/fields. The aforementioned concern of number transposition/data collection error (when, for example, writing a 15 digit visual tag number onto paper and then subsequently entering it manually into a system) needs to be addressed on a species-by-species basis. (Note: this comment provides further support for comment #4 regarding the need to adhere to species working group standards for ID devices).

7. The segregation of Public vs. Private data must be clarified under the plan.

There is an ongoing need for clarity regarding both the content and means of segregation of data provided to public and private systems under the plan. Much of this issue is driven by confidentiality issues and the inability of USDA to ensure producers that data provided into a public system will not be accessible through existing FOIA legislation.

Data required for disease traceability should be available by all state and federal officials on a 24/7 basis... all other information should remain fully in private systems unless producers individually chose to have this information forwarded to government systems with full knowledge of the potential for release under FOIA.

There is also concern regarding the current 840 tag allocation process as part of this standardized data reporting. Currently, much energy and expense is expended tracking the ID device in the federal system prior to the device being placed on the animal – focusing on getting the initial tagging reported (as is the case now with non-840 tags that are recognized as official devices) may better serve the industry.

8. Expand scope of USDA Messaging to include for-profit stakeholders; provide clear and consistent messaging over time.

NAIS is not a new program... it is a formalized, upgraded set of processes, standards and procedures that enhances what is already in use on a state, federal and industry basis. Outside of mandated disease program utilization, current market adoption under the voluntary plan is driven by economic incentives to producers – USDA does not effectively focus on these market-driven economic elements. Much of the current USDA messaging is focused on cooperative agreements with non-profit groups to message the importance of premises registration and disease program implementation; there is a clear need to engage for-profit entities to leverage their large market presence to deliver the economic message in a clear, concise, uniform manner.

The concept of clarity of message and consistency of the message (and the underlying plan) is also critical to both the credibility of the program and the broad market acceptance of its principles. To date, too much change from USDA has confused the market and has left producers to wait to see what will be mandated. Clear messaging, delivered through trusted local partners – be they federal or state officials, Veterinary Practitioners, ATDs, Livestock Markets, Livestock buyers, Suppliers, Extension Agents or the like – must be achieved in the messaging for it to be effective. To facilitate this, USDA must commit to a strong plan and renew it's commitment to the key principals of this plan and maintain the continued support of key stakeholders who support USDA's vision.

The content of messaging must be clear and concise: what is required, how to participate, what is the value. The message must also be tailored to meet the need of specific species groups as required, and should be able to provide value to large and small producers alike.

AMS Business Plan Comment relative to COOL “safe harbor” provisioning.

Although not directly linked at this writing, forward comments by Under Secretary Knight at the Workshop and the release of the AMS Business Plan to Advance NAIS (released earlier in the week), made the convergence of NAIS and COOL an important topic of discussion and comment at the workshop. Understanding that final language for COOL implementation is not yet available, plans to allow for the granting of “safe harbor” for COOL compliance to all NAIS participants was fully discussed by Under Secretary Knight and other USDA staff. This action was clearly seen by meeting attendees as accelerating interest and involvement with the plan. Potential synergies of NAIS and COOL can be seen as clear and compelling, but it is important to note that there was no consensus from the Workshop participants to combine the COOL law with NAIS. As USDA continues the effort to bring elements of these programs together, it would be prudent to be cognizant of the following considerations:

1. State stakeholder flexibility should be recognized for determination of COOL compliance;
2. Provision for recognition of non-840 official devices for “safe harbor” status when used under a PVP or QSA program;
3. Complete rules for identification of imported animals (including mandatory hot branding for cattle) need to be published;
4. Consideration should be given to the language of the 2002 Farm Bill which prohibits the use of a mandatory ID system for COOL; and,
5. How will imported animals information be treated – will such information on ownership be subject to FOIA?

The National Institute for Animal Agriculture ID-INFO WORKSHOP 2008 participants again thank USDA for their excellent participation in the program of ID-INFO WORKSHOP 2008 and also for this forum for submission of comments. We remain, through NIAA staff and leadership, ready to continue our contribution to this important process, and would welcome any and all continued dialog on this topic with USDA.

Appendix 1

NIAA ID-INFO WORKSHOP 2008 Agenda

Keynote Address

Bruce Knight, *U.S. Department of Agriculture Under Secretary for Marketing and Regulatory Programs*

Comprehensive USDA Business Plan Review

Neil Hammerschmidt, *USDA/APHIS/VS*

State Perspective of Business Plan: The challenges and opportunities

Moderator: Victor Velez, *California Department of Food & Agriculture*

Dr. Dave Fly, *New Mexico Livestock Board*

Melissa Garrett, *West Virginia Department of Agriculture*

John Heller, *Colorado Department of Agriculture*

Kevin Kirk, *Michigan Department of Agriculture*

Gary Wilson, *Ohio Department of Agriculture*

Industry Perspective of Business Plan: The challenges and opportunities

Moderator: Glenn Fischer, *Allflex USA, Inc.*

Dr. Marvin Shurley, *American Meat Goat Association*

Dr. Ashby Green, *National Cattlemen's Beef Association*

Adam Griffin, *iDairy*

Kerry Thompson, *American Horse Council*

Dr. Patrick Webb, *National Pork Board*

Dr. Cindy Wolf, *University of Minnesota*

Information Systems Perspective of Business Plan: The challenges and opportunities

Moderator: Glenn Smith, *AgInfoLink USA Inc.*

Dr. Michael Coe, *Global Animal Management*

Dr. Robert Fourdraine, *Wisconsin Livestock Identification Consortium*

Adam Griffin, *National FAIR*

Mark Shaw, *Micro Beef Technologies Ltd.*

Steven Smith, *DHI-Provo*

COOL - Review and Implementation *(No Presentation Available)*

Bruce Knight, *U.S. Department of Agriculture Under Secretary for Marketing and Regulatory Programs*

Workshop Sessions Key Questions to be Discussed:

- i) Integration of NAIS standards by livestock service providers (veterinarians, breeders, data providers, tag manufacturers, etc.)
- ii) Integration of NAIS standards by state animal health programs and cooperative programs
- iii) NAIS and COOL: How do these programs create common ground for implementing NAIS?
- iv) Are the Key Outcomes, as defined by NAIS Business Plan, appropriate in today's market environment?
- v) Are the timelines defined in the NAIS Business Plan realistic?

Follow-up Group Discussion of Key Workshop Findings Through Panel of Group Leaders

Closing Comments and White Paper Development Process

Glenn Fischer and Victor Velez, *Animal Identification & Information Systems Committee Chair and Vice Chair*