

U.S. House of Representatives
House Committee on Appropriations
Washington, DC 20515

June 25, 2008

Dear Representative:

We, the undersigned organizations, urge you to remove the provision from the House Agriculture Appropriations bill that requires USDA to purchase meat products that are derived from farms (premises) registered with the National Animal Identification System (NAIS) for the School Lunch Program. This provision undermines the School Lunch Program and promotes a flawed policy.

The subcommittee provided two reasons for including this provision. The first reason is to address public health concerns, specifically those related to meat recalls. The second reason is to increase participation in the NAIS. Both reasons are fundamentally flawed.

NAIS is a three-step program that calls for every person who owns even one livestock or poultry animal to register their property, tag each animal when it leaves its birthplace, and report a long list of movements to a database within 24 hours. The listed species include chickens, horses, cows, sheep, goats, pigs, llamas, alpacas, elk, deer, bison, turkeys, and more, whether or not the animal is used for food. Group or lot identification would only be allowed where animals are managed as a group from birth to death and never commingled with animals outside of their production system. In practice, group identification would apply mainly, if not entirely, to confinement operations (CAFOs) and vertically integrated operations. The stated goal of NAIS is to provide 48-hour traceback of all live animal movements.

NAIS will harm independent farmers and increase the consolidation of our food supply into the hands of a few large corporations. The school lunch provision in particular will favor the most vertically integrated farms that can easily prove that all their meat is from a NAIS-registered farm, as well as confinement operations that will be able to use group identification under NAIS. By creating incentives for CAFOs, the provision will harm both the public health and the environment.¹ Americans who are increasingly seeking out local and sustainable foods will find their ability to obtain these foods limited.

Linking NAIS to the School Lunch Program will also harm the growing movement of farm-to-school programs, while benefiting only large-scale, confinement operations where food safety problems are more likely to occur. The farm-to-school programs help improve children's nutrition while providing family farms with a reliable market. They also promote the local economy and environmentally sustainable agriculture, and re-connect children with the source of their food. But many of the small, local farmers who are participating in these programs, or who want to participate, are opposed to NAIS. Whether for philosophical reasons or the costs and burdens imposed by NAIS, these farmers are unlikely to be able to comply with the provision in the appropriations bill.

In the recent Hallmark/Westland beef recall, the fault lies with the packing plant for violating existing regulations and with the USDA for failing to properly inspect the plant. "Downer" cows were slaughtered and the meat was then provided to the School Lunch Program. In the video from the Humane Society, every time there was a clear shot of a cow's left ear, one can see a tag.² Changing the type of tag to an NAIS electronic tag would do nothing to address the problem.

¹ See Doug Gurian Sherman, *CAFOs Uncovered: The Untold Costs of Confined Animal Feeding Operations*, Union of Concerned Scientists (April 2008).

² <http://www.youtube.com/watch?v=kaM7Hpu47FY>

For these reasons, we strongly urge you to remove the provision that requires School Lunch Programs to purchase meat products from NAIS-registered premises. Additional background information on why NAIS is a flawed system to address food safety is attached. We thank you for your consideration.

Sincerely,

Adopt a Farm Family	Missouri Rural Crisis Center
American Corn Growers Association	Missourians for Local Control
American Grassfed Association	National Family Farm Coalition
American Land Foundation	National Latino Farmers and Ranchers Trade Association
American Policy Center	North Carolina Contract Poultry Growers Association
American Raw Milk Producers Pricing Association	Northeast Organic Farming Association Interstate Council
Arkansas Animal Producers Association	Northeast Organic Farming Associations / Massachusetts Chapter
California Farmers Union	Northeast Organic Farming Association of Vermont
California Dairy Campaign	Northern Plains Resource Council (MT)
Catholic Charities, Diocese of Sioux City (IA)	Organic Consumers Association
Citizens for Private Property Rights (MO)	Organization for Competitive Markets
Community Food Security Coalition	Ozark Property Rights Congress (MO)
Cornucopia Institute	Paragon Foundation
Davis Mountain Trans Pecos Heritage Association (TX)	Powder River Basin Resource Council (WY)
Diocese of Jefferson City, Missouri	Progressive Agriculture Organization (PA)
Downsize DC	Property Rights Congress
Empire State Family Farm Alliance (NY)	R-CALF USA
Environmental Conservation Organization	Regional Farm & Food Project (NY)
Equus Survival Trust	Rocky Mountain Farmers Union
Fair Food Matters (MI)	Rural Vermont
Family Farm Defenders	South Dakota Stockgrowers Association
Farm and Ranch Freedom Alliance	Sovereignty International, Inc.
Farm to Consumer Legal Defense Fund	Texas Eagle Forum
Federation of Southern Cooperatives	Texas Landowners Council
Focus on Agriculture in Rural Maine Schools (FARMS)	The Society for Preservation of Poultry Antiquities
Food for Maine's Future	Tuscaloosa Property Rights Alliance (AL)
Illinois Independent Consumers and Farmers Association	Western Organization of Resource Councils
Innovative Farmers of Ohio	Weston A. Price Foundation
Iowa Citizens for Community Improvement	White Earth Land Recovery Project (MN)
Liberty Matters	Whole Lunches (MI)
Maine Alternative Agriculture Association	Wintergarden Sustainable Agriculture Coalition (TX)
Maine Organic Farmers and Gardeners Association	
Massachusetts Small Holders Alliance	
Missouri Farmers Union	

Why the National Animal Identification System Does Not Address Food Safety

Livestock producers, who bear the burden under NAIS, are not the source of most food-borne illnesses. These illnesses are from bacteria such as salmonella, e. coli, and campylobacter, or the Norwalk viruses, which contaminate food due to poor practices at slaughterhouses or in food handling.¹ The NAIS would do nothing to prevent these problems from occurring. Moreover, because the tracking would end at the time of slaughter, the NAIS would not improve the government's ability to trace contaminated meats once they leave the slaughterhouse and enter the food chain.

NAIS is also not an effective control for BSE, or "Mad Cow Disease," even though NAIS affects live animals. BSE is believed to be caused by feeding infected animal material to cattle. So the key to addressing it is prevention of this practice through a strong feed ban. The second key to addressing Mad Cow disease is testing all or a significant percentage of the animals that enter the food supply, as is done in Japan and Europe. The USDA currently tests only about one out of every thousand slaughtered cattle,² and has opposed increased testing, whether government or private.

Although Congress has devoted over \$100 million in appropriations towards the program since 2004, Congress has never mandated NAIS, nor even mentioned NAIS in authorizing legislation. NAIS will impact millions of animal owners, including people raising food for themselves, hobby farmers, recreational horse owners, and those who own livestock as pets. Congress needs to hold hearings with a full and open debate on the validity of NAIS, not implement it via the back door through appropriations.

The concept of tracking every movement of every livestock animal in massive databases may sound impressive, but it is not founded in sound science, economics, or practicality. USDA has not provided any studies showing why 48-hour traceback is "optimal" nor why 100% of animals must be included. The susceptibility of animals to disease and the likelihood of transmission differ greatly depending on the species of animal, the exact disease, and the conditions under which the animals are kept. Therefore, it is obvious that a "one size fits all" solution cannot be based on science. USDA as yet has failed to complete a cost-benefit analysis, despite four years of implementing the program. Moreover, the experience of Australia, the only other country to implement mandatory electronic tracking of cattle so far, indicates that the databases are unwieldy and unworkable. The General Accountability Office's 2005 report on agroterrorism and livestock disease made it clear that parts of the U.S. animal health system needed improvement, but did not identify a need for increased tracking of live animals.³ No need has been demonstrated for NAIS.

¹ See Centers for Disease Control and Prevention, http://www.cdc.gov/ncidod/dbmd/diseaseinfo/foodborneinfections_g.htm#mostcommon.

Campylobacter, salmonella, and e. coli are all found in the intestines of animals, so that contamination occurs during the slaughter process. The Norwalk viruses are believed to spread primarily from one infected person to another, through handling of food by infected kitchen workers or fishermen.

² During a period of "heightened" testing in a two year period from 2004 to 2006, the USDA tested fewer than 700,000, or approximately 1% of the cattle slaughtered. See News Release, Statement by USDA Chief Veterinary Officer John Clifford (DVM) Regarding Positive BSE Test Results (Mar. 13, 2006). In contrast, the European Union countries tested more than 8 ½ million cows just in 2003, and tested over 6 million in just the first 9 months of 2004. See U.K. Food Standards Agency, Results of BSE testing in the EU, <http://www.food.gov.uk/bse/facts/cattletest>. In 2006, the USDA announced that it was reducing testing by 90%.

³ 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) (hereinafter "GAO Report on Agriculture").