

Copyright 2008 Mary-Louise Zanoni. This article first appeared in Farm for Life Newsletter, Issue 5, Feb. 2008. To subscribe, send \$25 (for four issues) to Farm for Life, P.O. Box 501, Canton, New York, 13617.

USDA's New Business Plan Makes NAIS Mandatory For All USDA Programs, All Interstate Shipping

Private Groups, such as Breed Associations and DHIA, Will Compel use of Microchips, RFID Tags, and NAIS Premises ID

On December 12, 2007, the USDA issued a new Business Plan setting forth its methods for drawing the vast majority of animal owners into the NAIS system over the next several years. Although the USDA continues to claim that NAIS is “voluntary,” under the terms of the Business Plan that simply is not true. The Business Plan will make NAIS mandatory in all of the following programs: all animal disease testing and vaccination programs; all process-verified and source verified-programs; for all interstate shipping permits (Interstate Certificates of Veterinary Inspection, or ICVIs). It appears that the USDA may plan to assign NAIS identifications (both premises and individual animal) in all these programs without the affected farmers/animal owners being aware that they are placed in NAIS simply through their continued participation in a longstanding USDA animal health, marketing, or shipping-permit program. In addition the USDA is enlisting various private entities and getting them to mandate the use of NAIS in their own programs. For example, the Business Plan indicates that breed associations will begin requiring NAIS Radio-Frequency Identification tags or microchips to register animals as early as March 2008. The Dairy Herd Improvement Association has agreed to assist USDA in imposing NAIS by assigning NAIS premises ID numbers to all dairy farms in its herd testing programs.

Below are discussions of how the Business Plan envisions mandating NAIS for some of the most widely owned species of livestock.

Horses. The USDA reveals in the Business Plan that it is going to impose a new federal rule requiring a Coggins test not only for every interstate movement of a horse, but for every sale of a horse. (Plan, pp. 26-27.) A NAIS premises ID will be required on the Coggins test paperwork. Thus, it will be impossible for horse owners to avoid being assigned a premises ID whenever they move animals between states or in most cases even to local shows or fairs (where the individual states or the sponsoring organizations typically require a Coggins test). The USDA expects to rely upon breed associations to require microchipping and NAIS individual animal ID for all horses registered. (Plan, pp. 27, 52.) Obviously, these requirements, taken together, ultimately will result in NAIS premises ID being imposed upon the vast majority of horse owners, and microchipping being imposed upon all owners of purebred horses. Further, the USDA plans that most providers of horse-related services will begin to require NAIS premises ID and microchipping before agreeing to provide needed services. (Business Plan, p. 27.) Through this means, forced microchipping will apply far beyond registered, purebred horses.

Cattle. The USDA plans to make NAIS premises ID mandatory for 70% of beef operations and to impose mandatory NAIS individual animal ID for 70% breeding cattle, all by 2009. The USDA expects to impose NAIS on over 95% of dairy farms by December 2009. Although the Business Plan does not directly state how this very high degree of dairy participation will be accomplished, the Plan implies that states might simply submit all their licensed dairy records to the USDA and have NAIS premises IDs assigned without permission of the farms. (Plan, p. 55.) According to the Business Plan (p. 19), USDA/APHIS automatically will assign a NAIS premises ID to any cattle owner who requests TB/brucellosis testing or brucellosis vaccinations for calves, and will also require NAIS RFID tags in those programs. Likewise, when a cattle owner needs an interstate shipping permit (certificate of veterinary inspection, or CVI), the USDA will simply assign a NAIS premises ID to both the origin and destination farms, as part of the process of issuing the permit.

The USDA admits it is already using NAIS in disease programs -- although the farmers participating in the programs apparently are not aware that they are being placed into NAIS databases. For example, TB and brucellosis testing and vaccination information are recorded in a USDA/APHIS “Animal Health Information System,” and the Business Plan (p. 9) explains, “These systems now use the National Premises Information Repository (NPIR) [the NAIS premises database] and the Animal Identification Number Management System (AINMS) [the NAIS database of individual animal numbers].”

The USDA also indicates it has secured the cooperation of breed associations, particularly the Holstein Association, and of the Dairy Herd Improvement Association, which will require NAIS participation as part of their programs. The Business Plan expects that as early as March 2008, breed registries will begin to require NAIS RFID tags to register new animals. (Plan, p. 52.) The Holstein Association in fact has been promoting NAIS RFID tags for several years; it is a supporter of NAIS because it expects increased revenues from sales of the tags and also from operating an animal-tracking database. The Business Plan (p. 18) also explains that about half of U.S. dairy herds employ DHIA testing to establish the production records and milk quality of individual cows. According to the USDA, DHIA will begin assigning NAIS premises IDs, in conjunction with the National Uniform Eartagging System, to create a standard DHIA identification for individual cattle.

Sheep and Goats. As described elsewhere in this issue (see “The USDA’s Scrapie Eradication Program and NAIS”), the Scrapie Eradication Program (SEP) is the main device used by the USDA to compile a government registry of sheep and goat owners. The Business Plan makes clear that NAIS premises ID numbers routinely have been assigned to sheep/goat owners in the SEP for some time now. (Plan, pp. 24-25.) Sheep and goat owners are not told that they are being assigned NAIS premises IDs when they sign up for the scrapie program. By making these secretive assignments of NAIS premises ID numbers, the USDA already has achieved 90% NAIS “participation” by sheep/goat owners – although the owners are in no way meaningfully “participating” in

NAIS if they do not know that they have been placed in the NAIS database and do not know that they have been assigned the NAIS premises ID numbers.

Recommended Actions. The foregoing aggressive measures by the USDA to impose NAIS will require livestock owners to prepare themselves with knowledge and determination to avoid NAIS. If you have been raising purebred, registered cattle, switch to grade cattle. Their sale value as breeding stock may be lower, but so is their cost. Likewise, avoid registered purebred horses. Make known to your breed registry that you will not be using them anymore because you do not approve of their cooperation with NAIS. Avoid any interstate movement of your livestock and avoid purchasing animals from other states. If you are in DHIA testing, get out of it and tell DHIA you are leaving the program because you disapprove of DHIA's participation in NAIS. Avoid participation in the scrapie programs for sheep and goats. You should also avoid participation in any USDA-related quality-assurance or marketing-claim programs, such as the National Organic Program, USDA "grassfed" or "naturally grown" programs, etc., because the USDA is also going to make NAIS mandatory in all those programs. (Plan, p. 52.) Finally, if you think that the USDA and state agriculture departments are being dictatorial and dishonest in the ways they are putting NAIS into effect behind people's backs, write to your state senators and representatives, as well as your U.S. Congressman and U.S. Senators, and ask them to stop NAIS.