

FARM AND RANCH FREEDOM ALLIANCE

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February 8, 2010

The Honorable Tom Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

Sent via facsimile and U.S. Mail: 202-720-6314

Dear Secretary Vilsack:

The Farm and Ranch Alliance applauds your decision to abandon the plans for the National Animal Identification System (NAIS). Our members, along with thousands of other citizens, have repeatedly argued that NAIS is an ill-conceived and unnecessary program that would benefit a handful of large companies at the expense of both farmers and consumers. We have also urged that USDA make inspection of imports a higher priority as part of its disease control efforts. Thank you for holding the listening sessions and for listening to the participants.

We appreciate the improved communication between USDA and concerned citizens, which began with the roundtable last year and has continued through the listening sessions and your recent conference call with the roundtable participants. In the spirit of further improving communication, we ask that you take the following steps:

- Confirm that USDA's use of the term "moved in interstate commerce" refers to animals that actually cross a state border. In the conference call, you stated that the new program will seek to be able to trace animals back to the State of origin, and that it is the State's decision whether and how to conduct additional traceback within the State. In other words, the USDA will trace only interstate movements, not intrastate. Unfortunately, the term "interstate commerce" is sometimes used to encompass **intrastate** activity that affects interstate commerce, and its use in the fact sheet has therefore created confusion.
- Confirm that each State may choose what registration and identification systems it will use for State programs, including low-tech methods such as branding and metal tags, and

that USDA will not use penalties or preferential treatment in funding State programs to coerce State adoption of NAIS-based technology such as the premises allocator system or 840 tags. USDA's past history of using the cooperative agreements and disease control programs to push States into adopting NAIS is a major source of the distrust of USDA and state agriculture agencies.

These issues were raised during the conference call and we appreciated your straightforward responses at that time. It is important for USDA to confirm these statements in writing in order to increase the public's confidence in USDA's announcement. An addendum to the fact sheet posted on USDA's website would be a simple method for clarifying these issues.

Finally, we appreciate your commitment to an inclusive, transparent approach to the new framework for traceability. We would like to have representatives on your Advisory Subcommittee and will be submitting specific nominations shortly. We urge you to include a significant number of representatives from the 100 organizations who have previously submitted joint letters to USDA with concerns about the agency's program for animal traceability.

Thank you again for your responsiveness to our concerns.

Sincerely,

Judith McGeary
Executive Director
Farm and Ranch Freedom Alliance