



Iowa
Cattlemen's
Association

October 5, 2020

Docket No. APHIS-2020-0022
Regulatory Analysis and Development
PPD, APHIS, Station 3A-03.8
4700 River Road, Unit 118
Riverdale, MD 20737-1238

Submitted electronically via <http://www.regulations.gov>

Re: Notice and Request for Comment: Use of Radio Frequency Identification Tags (RFID) as Official Identification in Cattle and Bison covered under 9 CFR, Part 86

The Iowa Cattlemen's Association is a grassroots organization representing more than 8,500 independent cattle producers and stakeholders affiliated with the beef cattle industry. We submit the following comment on the proposed rule, Use of Radio Frequency Identification Tags (RFID) as Official Identification in Cattle and Bison covered under 9 CFR, part 86.

Introduction

For many years, members of the Iowa Cattlemen's Association have thoughtfully debated the use of electronic identification for animal disease traceability. This topic garnered enough attention to warrant the development of an internal task force composed of members representing each sector of the beef cattle industry, livestock auction markets, and the field of veterinary medicine. These subject matter experts spent countless hours weighing pros and cons of the use of electronic identification for animal disease traceability. Their efforts helped inform our broader membership, which has ultimately led to further developing our policy position on the topic.

We ask that the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) take the following statements into consideration before proceeding with the proposed timeline outlined in the rule.

Statement of Need: Animal Disease Traceability

Iowa's beef cattle industry is vital to the economy of our state. With nearly 4 million head of cattle, our industry generates approximately \$4 billion in cash receipts. This is equal to nearly 15 percent of all Iowa agricultural receipts.

In addition, the state of Iowa is a global leader in the export of value-added agriculture products. Iowa's cattle producers raise safe and nutritious beef for consumers within our state and around the world.

Due to the economic value of the beef cattle industry and its impact on the livelihoods of nearly 20,000 beef-producing farm families, the Iowa Cattlemen's Association affirms the need for a robust animal disease traceability system. We believe the primary purpose of an animal disease traceability system is to allow state and federal animal health officials, and the cattle industry as a whole, to efficiently and effectively respond to an animal disease outbreak in a timely manner. This is why the Iowa Cattlemen's Association has long advocated for funding to support animal disease preparedness efforts, to include Iowa State University's nationally renowned Veterinary Diagnostic Laboratory.

Iowans know firsthand the devastating effects of an animal disease outbreak. The Iowa Cattlemen's Association wants to prepare as much as possible to mitigate the impacts of any future outbreaks, while respecting the needs of independent cattle producers.

Overview: Current Iowa Cattlemen's Association Policy

The Iowa Cattlemen's Association is well aware that the animal disease traceability system within the beef cattle industry will change in the future. Our members enacted a policy in 2019 to guide our organization's actions on this topic. In brief, the Iowa Cattlemen's Association believes an effective animal disease traceability program should:

1. Be compatible with private sector animal ID and verification programs backed by the USDA.
2. Be compatible with the general traceability principles of the OIE - World Organization for Animal Health.
3. Recognize existing USDA programs for beef exports.
4. Be built using infrastructure that supports other potential uses of ID.
5. Utilize low cost electronic official tagging devices paid for by federal and/or state funds, when possible.
6. Require that cattle ID information for disease traceability be kept confidential and strongly protected from disclosure.
7. Protect ownership information from disclosure to future owners.
8. Protect producers from liability for acts of others, after the cattle have left the producer's control.
9. Operate at the speed of commerce.
10. Not replace or impede existing state brand inspection activities.
11. Work within a framework to accommodate all classes of cattle.

Voluntary vs. Mandatory

In December 2019, producer members of the Iowa Cattlemen's Association were surveyed for input regarding support for either mandatory or voluntary animal disease traceability systems. The majority of producers in Iowa do not support mandatory traceability efforts at this time. The primary concerns of producers include the costs affiliated with infrastructure and tags, as well as data management/confidentiality.

Primary Concerns: Data Management/Confidentiality and Cost

The Iowa Cattlemen's Association cannot support a mandated transition to the use of any new technology, to include RFID tags, until specific measures are put in place to safeguard private information and business practices of independent cattle producers from other stakeholders in the beef cattle industry and meat supply chain.

First, we ask that data collection be limited to date, time, GPS, official identification number--the minimum data points necessary to meet the specific purpose of an animal disease traceability system.

Second, we request that data be housed in private databases, such as the database utilized by U.S. CattleTrace, to protect confidentiality. If this is not a viable option, we ask that USDA promulgate confidentiality rule(s) to protect against disclosure of data and the data be held in state databases.

Finally, USDA must work to ensure that the tags and technology utilized in the future are not cost-prohibitive for producers within any sector of the beef cattle industry.

FYI: Current RFID Tag Use in Iowa

In 2020, USDA APHIS began providing RFID tags as a no cost alternative to metal clip tags to states and accredited veterinarians. The tags are intended for replacement heifers vaccinated against Brucellosis. The Iowa Department of Agriculture and Land Stewardship (IDALS) received more than 200,000 tags, yet under 10,000 have been utilized across the state.

The Need for Electronic Interstate Certificates of Veterinary Inspection (ICVI)

Interstate Certificates of Veterinary Inspection are currently provided in paper form. An electronic option (in addition to the current paper form) for ICVIs would add value to an RFID tag. We ask that this opportunity be explored with guidance and input from individual states and their respective state animal health officials.

Supporting Livestock Auction Markets and Rural Veterinarians

USDA must take into account the value that livestock auction markets bring to the beef cattle industry. Nearly 40 livestock auctions provide an avenue for independent cattle producers to market their cattle in Iowa.

Livestock auction markets should not have to bear the burden of the costs associated with infrastructure, specifically readers, for RFID tags.

In addition, USDA must take into account the important supporting role of rural veterinarians in the beef cattle industry. In order for RFID tags to be most effectively utilized, veterinarians must be equipped with the appropriate tools and infrastructure to install and read tags.

The Iowa Department of Agriculture and Land Stewardship (IDALS) has purchased readers to support veterinarians as they work to promote voluntary use of RFID tags, but this is not widely available across the entire state at this time.

Conclusion

Most recently, Iowa's beef cattle producers have been challenged with significant market disruptions, volatile cattle markets, extreme drought conditions, and more. With the financial implications and uncertainty surrounding data management and confidentiality, the Iowa Cattlemen's Association requests that USDA APHIS reassess their timeline for implementation of RFID use for cattle. We believe further research is needed to develop a fully-functional and effective animal disease traceability system.

The Iowa Cattlemen's Association appreciates the opportunity to provide comment on this important matter. Questions related to this comment may be directed to Cora Fox, Director of Government Relations, at (515) 296-2266 or at cora@iacattlemen.org.

Respectfully,

A handwritten signature in black ink, appearing to read "Richard W. Godfrey", with a horizontal line underneath.

Richard Godfrey
President, Iowa Cattlemen's Association