

Can you tell the USDA no to electronic animal ID?

Independent family farmers are facing going out of business and consumers are facing record high meat prices, all due to the highly consolidated meat industry that is controlled by a handful of large meatpacking corporations (many of which are foreign controlled corporations like Smithfield and JBS). And, yet again, our federal government and the corporate lobbyists are proposing new requirements for the benefit of these same corporations at the expense of family farmers, rural communities, and our national food security.

The United States Department of Agriculture (USDA) has announced that it intends to mandate electronic identification tags for cattle that cross state lines. And since many state animal ID programs are connected to the federal one, in practical terms, many farmers will be forced to use these Radio Frequency Identification Devices (RFID) tags even for in-state movements.

Technically, this isn't a new idea—USDA proposed this as part of a larger electronic ID plan for all livestock 15 years ago, but withdrew the plan under a storm of protest from both farmers and consumers. And now they're working to bring it back, at a time when family farms cannot afford it.

This expensive, intrusive, and unreliable ID system benefits two groups: the large meatpacking corporations, and the technology companies that produce the electronic tags, readers, and software.

USDA and the meatpackers argue that traceability is about addressing animal disease and food safety. But we know that's not the whole truth—far from it. It's about furthering corporate control of the meat industry by creating yet more regulations that promote international trade for the big meatpackers, are cheap for large-scale operations, and burden family farmers.

Data from the Center for Disease Control shows that the vast majority of food-borne illnesses in meat are the result of practices at the slaughterhouse and afterwards in the processing and handling. We have seen millions of pounds of meat recalled due to unsanitary conditions and a lack of proper oversight at huge slaughterhouses. But the animal ID program ends at the slaughterhouse door. RFID tags on cattle won't do anything to increase food safety.

Nor will RFID tags make our animals healthier. USDA continues to allow imports of livestock from countries with known disease problems. In fact, this electronic ID plan is primarily designed to maximize corporate profits by promoting exports and imports of animals and meat – further increasing the risk of introducing and spreading diseases.

The pork industry already converted to an electronic ID system, but that did not prevent widespread animal deaths when the porcine epidemic diarrhea virus hit the U.S. in 2013.

All one needs do is look at who served on the working groups that developed this latest version of the plan. There were few actual cattle producers, and the chairs and co-chairs were

dominated by representatives of corporations that manufacture electronic tags and the equipment necessary to apply, read, and track data from the tags, together with the organizations that promote the corporations that already control huge swaths of our livestock and meat industries.

If USDA wanted to address food safety and animal disease, it would increase oversight and testing at the large meat processing plants; and stop boxed meat and live cattle imports from countries with known disease problems. These two steps would do far more to promote a safe, secure food supply than sticking RFID tags in cows' ears.

### **A Little History**

Just how did we get here? Here's a synopsis:

**2005:** USDA announced a plan to require the owners of every single livestock and poultry animal in the country to register their property with the government, tag each animal with an internationally unique ID number (in most cases, with electronic forms of ID), and report their movements to a corporate/government shared database. This was the National Animal Identification System (NAIS).

**2010:** Following five years of strong opposition, USDA withdrew its proposal for NAIS.

**2013:** USDA adopted a new rule for animal ID requiring "official identification" on cattle over the age of 18 months (and dairy cattle at any age) that cross state lines. **The regulation explicitly allows for a variety of official identification methods, including the standard metal ear tag. This program has worked well for the last seven years.**

**2019:** USDA released a "fact sheet" on electronic ID for cattle and announced that it would stop approving any non-electronic form of identification. This document effectively mandated use of electronic ID by amending existing regulations without going through the legally required process. The agency withdrew the document after the Trump Administration issued an executive order that directed federal agencies to halt the use of "guidance documents" to impose regulatory requirements.

**JULY 6, 2020:** USDA released its current proposal and requested public comment on its plan to require RFID tags as official identification for cattle. This announcement STILL is not going through the full rulemaking process, allowing the agency to avoid doing a cost-benefit analysis or address the impact on small businesses.

### **Additional Concerns About RFID**

The plan to mandate RFID tags does not benefit the U.S. consumer nor the family farmers and ranchers that form the backbone of the cattle industry. And it raises a number of questions and concerns:

- Data security: How will the data be protected, who has access to it, and under what conditions? This data will not just be in government databases, but collected by individual veterinarians, who will be storing farmers' information to send to state agencies.
- Tags (electronic or otherwise) fall out. Low-tech identification systems, such as branding, will still be necessary as backup.
- Traditional metal ear tags cost about 10 cents each, and the USDA provides them to farmers for free. The agency estimates the cost to farmers for RFID tags will be \$2-\$2.60 per head. That doesn't seem like much, but that translates to sales for the tag manufacturers of tens of millions of dollars each year.
- Proponents have not provided a scientific basis for replacing the existing ID programs with one that is significantly more expensive and intrusive.
- Does the export market really need this type of government assistance? Even in the midst of COVID-related meatpacker shutdowns, the largest meat processors continued to ship meat overseas, all while American consumers faced skyrocketing meat prices ... if they could find meat at all.
- Why impose these requirements without going through the normal process for rulemaking? USDA should conduct a full cost-benefit analysis, provide it for public comment, and demonstrate to the public that the benefits are more than just a marketing tactic for exporters.

## TAKE ACTION

**The USDA is accepting public comment until October 5.**

You can submit comments to USDA online at

<https://www.federalregister.gov/documents/2020/07/06/2020-14463/use-of-radio-frequency-identification-tags-as-official-identification-in-cattle-and-bison>

Given USDA's improperly close relationship with the meatpackers and technology companies, getting the agency to change its mind will be difficult. **So also send your comments to your U.S. Representative and Senators and urge them to stop USDA from spending taxpayer dollars on this bad program.**

Email: You can look up who represents you and send a message online at

<https://fiscalnote.com/find-your-legislator>.

Calls: You can look up your U.S. Representative at [www.house.gov](http://www.house.gov) and your Senators at [www.senate.gov](http://www.senate.gov), or call the Capitol Switchboard at 202-224-3121 and ask to be connected to their offices

