The Official Newsletter of the North American Packgoat Association

February 2008 -- Special NAIS Issue

The NAPgA Bleat!

NAIS:
Two years ago I tried to tell this list about NAIS, but did not generate a lot of interest.
NAIS has not changed its plans or its provisions since 2005.
It has three components. Premise registration, animal ID and movement tracking. It will be implemented one component at a time.
It involves 23 species and it will effect you whether you have 1 goat or 2000 chickens. At full implementation you will be required to report all movement on or off the place that involves sale or comingling with other animals from other farms—every rendy you go to will have to be reported unless you are only going with animals from your farm (not likely).
At this time there is no charge for premise ID but once they get you to sign up there will be a charge. There will also be a charge for reporting and for tagging and for the tags and fines for non-compliance.
Currently NAIS is “voluntary” at the federal level but cooperative agreements exist between USDA and all 50 states as well as Farm Bureau and 4-H, some breed associations and other NGO’s. How can you fight it?
Join Liberty Ark at www.libertyark.net Farm and Ranch Freedom Alliance at www.farmandranchfreedom.com or www.stopanimalid.com or www.NAISsucks.com or just plug in anti-NAIS and you will get literally basketfuls of websites and groups.
Individual states also have groups and if you live in Arkansas join ARAPA. You will get alerts from these groups to tell you when something is in the works and give you assistance in calling your politicians and voicing your complaints.
There is a lot you can do but don’t sit on your hands and wait for somebody else to do it please.
Norman & Susie Stretton
nightsong@camtel.net

And another input:
The following is quoted exactly from the most recent version of the NAIS User’s Guide, available online at
“There is no Federal requirement for producers to participate in, or use, any aspect of NAIS. For the administration of Federal disease programs, USDA is using the NAIS data elements (formats for premises location identifiers and animal identification numbers) in order to standardize data. Each location involved in a disease program or in a disease investigation or emergency response will be issued a premises identification number, if one has not previously been assigned. Producers may elect to use NAIS compliant identification devices to meet existing regulations for animal identification. Federal disease programs include: brucellosis in cattle, bison, and swine; tuberculosis in cattle and cervids; scrapie in sheep and goats, and pseudorabies in swine. Data in NAIS formats will be stored in NAIS databases, which are part of the Veterinary Services animal health information system. States and Tribes are directly responsible for premises registration and manage and hold premises registration information at the State level. Limited information about premises is also available at the Federal level in order to enable effective traceback or notification in disease situations, however, the Federal Government does not maintain information about species, number of animals, etc., and primarily relies on the States/Tribes to oversee this component and data. See page 17 for further details.”

From Jan
So although NAIS is voluntary at the federal level (and this is repeated many times in the Users Guide), if you are enrolled in the mandatory scrapie program, in the interest of ‘standardization’ you are issued a premises number in the NAIS format. Sounds like a roundabout way to assign mandatory premises ID.
Jan Huffaker
jhuffaker@rmi.net

NAIS:
The following article is copied with permission from the Sheep and Goat Health Report, a National Institute for Animal Agriculture publication. This article was written in spring of 2007. USDA/APHIS clarifies ID Requirements of NAIS, NSEP, SFCP
In December 2006 as part of the National Animal Identification System (NAIS) outreach and education program, the U.S. Department of Agriculture’s (USDA) Animal and Plant Health Inspection Service (APHIS) issued a statement that officially clarified the role of NAIS and the identification requirements of the National Scrapie Eradication Program (NSEP) and the Scrapie Flock Certification Program (SFCP).
In December 2006 as part of the National Animal Identification System (NAIS) outreach and education program, the U.S. Department of Agriculture’s (USDA) Animal and Plant Health Inspection Service (APHIS) issued a statement that officially clarified the role of NAIS and the identification requirements of the National Scrapie Eradication Program (NSEP) and the Scrapie Flock Certification Program (SFCP).

The following is the complete statement issued by USDA in December:
USDA acknowledges that there has been some confusion about the NAIS and how it interacts with existing scrapie...
eradication programs such as the voluntary SFCP and the NSEP.
The NAIS is voluntary at the Federal level. USDA firmly believes that it is a producer’s choice to participate in any aspect of the program and that the NAIS works best when livestock owners/producers freely decide to take part.
For this reason, at the Federal level, enrolling in the SFCP or requesting official tags as part of NSEP does not register your premises in the NAIS. Conversely, choosing to register your premises in the NAIS does not affect your flock identification number or your status in the SFCP. The three programs compliment each other, but are distinct.
The NAIS is voluntary. SFCP is voluntary. Complying with the identification requirements of the NSEP is required by a regulation that has been in place since August 2001. Producers are not required by USDA to participate in the NAIS in order to either enroll in SFCP or to get the official eartags provided free to producers through NSEP
Some of the NAIS approved eartags have also been approved for scrapie program use. This allows producers to participate in all three programs using the same eartag. As with other NAIS tags, premises registration with NAIS is required to purchase these tags.
Continued grassroots input is critical to the success of the NAIS. Accordingly, USDA and its state and industry partners have established NAIS working groups to provide recommendations and input as we move forward with the system.
Each species working group membership consists of representatives from various levels and segments of their industry.
The sheep working group has recommended that sheep producers who decide to participate in the NAIS be allowed to use the identification devices numbering systems currently used for SFCP and NSEP.
The recommendation does not mean that producers participating in SFCP and NSEP will be registered in NAIS. Only that those who choose to register would have the option to continue to use SFCP and NSEP identification devices.
Note from Jan: This again only refers to the federal requirements. Individual states may have more stringent requirements.
Carpe Diem!
Jan Huffaker
jhuffaker@rmi.net
www.huffakerfarms.com

If you have livestock of any type, the NAIS plan will affect you.
If you’ve adopted a wait and see attitude, now is the time to get actively involved before this is forced upon us.

USDA Plans to Use Breed Registries to Implement NAIS
USDA plans to use breed associations to force NAIS registrations, beginning as early as March 2008, less than two months from now. USDA's Business Plan calls for breed registries to start using an official Animal Identification Number, or “AIN” in their registry. And since you must first register your property in NAIS before you can obtain an AIN, this could effectively implement the first two stages of NAIS for anyone in those registries!
The breed registries for cattle, horses, sheep, and goats are potential targets, but the Plan does not indicate which breed registries have agreed to implement NAIS.
Take Action: Contact your breed association or other livestock registry and find out if it will be implementing USDA’s Plan.
Ask the registry:
a. Do you plan to require members to use the USDA's 15-digit Animal Identification Number (AIN) to enter or maintain animals in your registry?
b. Do you plan to require members to use the State’s or USDA's premises registration system in order to obtain a breed registration number?
c. Can you please confirm the registry's intentions in writing?
Tell them that you do not want them to be a tool for implementing the government’s plan for NAIS!

Next Steps:
a. If they plan to force their members into NAIS, consider finding another association to meet your needs if possible. If you do leave your association, be sure to tell them why.
b. Spread the word! If you find out that your breed association plans to force NAIS on its members, tell all the people you know who are in that association or considering joining. Post to the online groups that focus on your type of animal. Let people know how the association is working against the best interests of its members.
c. Email us to let us know what your breed association says. We’ll post a list of organizations that are requiring NAIS and those that aren’t.

More Information:
The USDA published its Business Plan in December of last year. You can download the Plan at http://farmandranchfreedom.org/content/Government-documents. The Plan sets aggressive targets for implementation of NAIS. One of the strategies for achieving those goals is “harmonization” among various systems that already use individual identification. Harmonization involves changing
the existing programs so they use the NAIS-compliant Animal Identification Numbers (AIN’s). (Plan, pp.28-29).

As part of its harmonization strategy, USDA lists having breed registries begin using NAIS AIN’s in March 2008, less than two months from now. (Plan, p.52). The AIN is a 15-digit internationally unique identification number. It starts with “840” which identifies the animal as coming from the US. (Plan, p.30). In order to get an AIN under NAIS, you have to register your property (“premises registration” under the NAIS plan). The legal effect of this registration is unknown, because there has been nothing like it before -- permanent federal registration of citizens’ property, linked to an issue (animal ownership) that carries potential liabilities.

With this harmonization strategy, USDA plans to use our private associations to force livestock, poultry, and horse owners to register their property and tag their animals under a government program, despite the continued protests of animal owners across the country.

Contacts for more information:
Liberty Ark Supporters: The Liberty Ark email system is still down. You can contact the Coalition by emailing one of the Steering Committee members, Karin Bergener, at bergener@config.com or calling her at 330-298-0065.
FARFA List: As always, you can reach us at info@farmandranchfreedom.org or 866-687-6452 with any questions.

Working together, we can make our voices heard.
Judith McGeary
Farm and Ranch Freedom Alliance, 8308 Sassman Road, Austin,TX 78747
www.farmandranchfreedom.org
866-687-6452

Farmers fear a barnyard Big Brother - from LA Times

LA Times did a good write up recently on Animal ID. Most noteworthy is that President Bush has not yet registered his own ranch in Texas.

Here is the intro to the article:

A Federal Database of Animals To Fight Disease Outbreaks Is A Threat To Privacy And Family Operations, Critics Say.

By NICOLE GAUETTE, Los Angeles Times Staff Writer, January 14, 2008

WASHINGTON -- After days of parading around her beefy black steer in the dung-scented August heat at the Colorado State Fair, Brandi Calderwood made the final competition. For months, the 16-year-old worked from dawn well past dusk, fitting in the work around school, to feed, train and clean her steer. But just before the last round, when the animals are sold, fair officials disqualified her.

They alleged that Brandi had not properly followed a new and controversial rule that required children to register their farms with a federal animal tracking system. After heated words, the Calderwoods were told to leave. A security guard trailed Brandi and her mother, even to the restroom.

“Emotionally she went through the wringer and didn’t get the honor of showing in the sale. For a 16-year-old, that’s a big deal,” said Cathy Calderwood, Brandi’s mother.

A Bush administration initiative, the National Animal Identification System is meant to provide a modern tool for tracking disease outbreaks within 48 hours, whether natural or the work of a bioterrorist. Most farm animals, even exotic ones such as llamas, will eventually be registered. Information will be kept on every farm, ranch or stable. And databases will record every animal movement from birth to slaughterhouse, including trips to the vet and county fairs.

But the system is spawning a grass-roots revolt.

In fact, President Bush has not registered his Crawford, Texas, ranch or the eight head of cattle he keeps, according to a White House spokesman.

Opponents of the ID system, however, say USDA actions are making the program virtually compulsory. Since 2004, USDA has pledged more than $51 million to states and farm groups to promote premises registration -- but they must register a certain number of farms to get the money. “They only get the money if they get the performance,” said Knight, who acknowledged “a great deal of resistance out there.”

Some states have responded by registering farms in less than voluntary ways.

Idaho, New York and Massachusetts issued premises numbers to livestock owners unasked. Texas adopted regulations for elk that initially required microchips and a report of any movements “by the close of the next business day.” Wisconsin told milk producers that cheese plants could not take milk from farms without a premises number. North Carolina announced that only farmers with a premises ID could receive drought aid.

Michigan required any cattle leaving a farm to have radio-frequency ID chips with individual numbers. When one farmer in East Jordan refused, arguing that he sells from his 20-head herd only to people he knows, the state agriculture department showed up with a search warrant, sheriff’s deputies and state troopers to tag and test his animals.
ADGA Position Statement In Regards To NAIS
Followed by a series of questions and answers.

These were taken from the ADGA website. My thanks to Carolyn Eddy who has provided lots of information concerning NAIS. Here is the link to the ADGA information: [http://adga.org/faq-nais.htm](http://adga.org/faq-nais.htm)

ADGA Position Statement: ADGA supports the concept of a national animal identification system for purposes of trace-back in emergency situations, with the understanding that there are concerns which must be addressed as to issues of privacy, cost and implementation.

ADGA supports requiring the data system be kept confidential and exempt from disclosure under the Freedom of Information Act. Further, ADGA supports that this system be USDA-maintained and cannot support a sole-source privatized data system.

ADGA believes that the unit cost per animal for identification and tracking will place undue burden upon those that do not benefit from the economies of scale that will be available to larger livestock producers.

ADGA can only support monitoring activities considered high risk commingling events as defined through the efforts of the Sheep and Goat Species Working Groups.

ADGA is concerned that established methods of identification will be discarded in favor of a one size fits all identification device which would not be reliable or cost-effective for use on small ruminants.

ADGA supports using the methods of identification accepted under the National Scrapie Eradication Program pending future advances in reliable and cost-effective identification systems for small ruminants.

ADGA also encourages its members to remain engaged in NAIS by providing input through the Species Working Groups and other designated state and federal forums.

#1 Q: Does this (link) statement regarding NAIS mean that ADGA supports “NAIS”?

#1 A: No, this position statement does not express support of the National Animal Identification System (“NAIS”) in its current form. However, ADGA does recognize the need for a workable program for the specific purpose of trace-back in emergency situations. It further identifies concerns about any animal identification system that might be developed, and these concerns include privacy; data storage; costs involved; methods of identifying animals; and any reporting of information. ADGA continues work to have tattoos accepted as an approved form of member animal identification. ADGA provided critical input to have the National Scrapie Eradication Program allow the use of tattoos and electronic identification as approved ID methods when accompanied by a copy of the animal's registration certificate. The Goat Working Group is asking that the same be allowed for any NAIS identification need.

#2 Q: Has ADGA released any member information to NAIS?

#2 A: No. There has been no member information requested by NAIS officials, nor has any information been released.

#3 Q: Does ADGA plan to release any member information to NAIS?

#3 A: The ADGA Board has not yet developed any specific procedures to address actions that might be taken should there be an animal disease emergency in the US that could affect goats. This will need to be considered at some point in the future. The ADGA Board has also not discussed nor developed a response should NAIS request membership information as a voluntary contribution.

#4 Q: Has ADGA received any money from NAIS?

#4 A: No. ADGA has not considered nor participated in any of the grants nor other funding available for NAIS implementation.

#5 Q: My state is considering a mandatory animal ID program. Will I be required to use ear tags to ID my goats?

#5 A: Each state has the option to implement a mandatory animal ID program, even if there is no national mandatory program. We encourage members to work with their individual states to help make sure goat owners are represented on state ID working groups and to give their personal input as well. Also, we suggest that members encourage states to adopt the recommendations of the Goat Working Group to allow flexibility for goat ID, including the use of ADGA assigned tattoos. The Goat Working Group has recommended that all forms of ID currently allowed in the Scrapie program (National Scrapie Eradication Program) be allowed for use with NAIS. That includes these optional forms of identification:

1) Official scrapie tags provided through the National Scrapie Eradication Program (NSEP)
2) Tattoos (legible individual registry tattoos when the animal is accompanied by its registration certificate listing the tattoo)
3) Electronic ID if recorded on the registration certificate. You must also have your registration certificate (or a copy of it) or a health certificate which includes the microchip number that matches the one on the registration certificate.

#6 Q: Where can I find more official information about NAIS and goat identification?

#6 A: Here is the web site for the NAIS Goat Working Group: [http://AnimalID.org](http://AnimalID.org) This is not an ADGA group, but ADGA members as well as members from other goat registries have served on the committee. It has worked to help ensure that goat breeders have input into any animal identification program affecting goats. It has also made specific requests to USDA to allow the options of using
the forms of ID listed above, including ADGA tattoos. The USDA web site for NAIS is: [http://www.usda.gov/nais/](http://www.usda.gov/nais/)

**#7 Q:** Is the survey recently requested from USDA/NASS related to the NAIS program?

**#7 A:** No. NASS is the National Agricultural Statistics Service and NAIS is the National Animal Identification System - a program under the Animal Plant Health Inspection Service agency. These are very different. Providing details about one’s operation to NASS does not provide anything to USDA/APHIS nor NAIS. Congress mandates that an Ag Census be conducted every 5 years. It is important that small farms be accurately represented in these census figures. For more information, see [http://www.agcensus.usda.gov](http://www.agcensus.usda.gov) Also add MORE INFORMATION

Link to continue) Additional Sheep and Goat Inventory Surveys are provided at intervals between the 5 year Ag Census reports.

While they are under the same department (USDA - U.S. Department of Agriculture), they are entirely different. NASS is an agency within USDA and NAIS is a program managed by another agency (APHIS-Animal Plant Health Inspection Service). The NASS is prohibited by law from sharing private information outside their specific agency, even if the other agency is within USDA.

The NASS made a presentation to the ADGA Board in 2002, and make it clear that information collected through Agriculture Surveys is confidential information that is not shared with other agencies. The Board of Directors approved providing a membership directory for use by NASS in their development of a mailing list. The information contained is already available to anyone who is a member or may be purchased by non members. NASS uses a variety of sources to help develop contact lists for the surveys, in order to reach as many potential people as possible. A number of people have worked for years to get goats represented with national statistics programs. Previously goats were grouped under “other”. We were finally successful in getting them listed separately, and now we even have meat, dairy and fiber listed individually. Due to this accomplishment and the numbers of goats reported in these surveys, goats are getting more recognition and consideration. Because of the significance of these numbers, we have a much better chance of getting goats added to various drug label uses, when previously they were not even considered. With the help of our friends and colleagues in the sheep and meat goat industries, we have even been able to have goats added for consideration for compensation for drought assistance in some areas.

For example, in 2004, a total of 30,649 goat producers from 42 states received $8 million in disaster aid. This included goats raised for meat, dairy and fiber. Goats had previously not been included in the drought assistance program. In some states, they chose not to include them because there weren’t significant numbers reported. If producers had reported the numbers, the picture could have been very different.

For more information about NASS, read additional material here:


**#8 Q:** Does ADGA release ownership information on DHIR animals or appraised animals to USDA?

**#8 A:** No, only pedigree information such as name of animal, sire and dam ID along with birth date are sent to USDA's Animal Improvement Programs Laboratory (AIPL) for genetic evaluation correlations. For appraised animals, only the linear trait scores along with the animal registration ID is sent. ADGA sends no ownership information to USDA-AIPL.

**#9 Q:** Does ADGA release other ownership information to USDA?

**#9 A:** Information regarding two herds was released to the USDA/APHIS after they were found to have Scrapie positive animals. The herd owners were contacted and provided written permission to do so.

**#10 Q:** I have heard that NAIS will be requiring breed registries to use an AIN system for registration numbers, and that members will be required to have a Premises number before they can register their goats. Is this true?

**#10 A:** The simple answer is no. We have received confirmation from USDA that Registries will have an opportunity to use AINs (a 15 digit standardized Animal Identification Number). We have further been told that there is no plan to require breed registries to do so. According to the USDA/APHIS, “.the option for breeds to use AIN as part of their breed registry is their choice. If they elect to do so, the policy for the use of AIN follows the policies defined by NAIS. It has always been defined by NAIS, that if one elects to use AINs, a PIN (Premises ID Number) is necessary as the tags are allocated/distributed to PINs”. Further they indicate, “Our timeline to work with breed registries (page 50 of NAIS Business Plan) is for staff to have explained the AIN with the breed registries so they know how it “works” and if they elect to consider using it, we want to support them accordingly with proper training/information, etc.”

The ADGA Board has had no discussions about requiring members to have a premises number in order to register their animals or use ADGA services. We have also not received anything from USDA requesting us to do so. Should we receive a request from USDA in the future, we will make every effort to discuss it at length before any decisions are made.

Several years ago, there was discussion about the possibility of adding Premises numbers to ADGA registration
ADGA Directors were approached by members in states such as Wisconsin that are now required by the state to have a premises number (PIN) before they can enter shows. The members indicated that adding that information to their registration papers would assist them in meeting the rules of the state. There was also informal discussion of adding AIN numbers to registration certificates, if requested by individual members.

We’re always looking for ways we can serve our members, and this informal discussion was prompted by that desire. For example, if we can assist members by adding this information to registration papers on request, that could allow them to continue to use our unique tattoo system in lieu of tagging their animals, should they need some sort of official ID for moving their animals to sales or shows (such as the rules for the National Scrapie Eradication Program). By adding the additional information to the registration certificate, it would then provide a database link to that animal that could meet the needs of a national ID system. We have also heard from many members who do not want to use ear tags for their animals. By providing a method to “connect” these numbers on a registration certificate in our database, they could keep the option of using tattoos for the identification. In essence, the number would be on the paper rather than in the ear, and the tattoo would remain the permanent ID method instead of an ear tag. Or, if they choose to use the 15 digit Scrapie Program tags or other approved tags, this information could be printed on the registration paper, if desired by the member. No decisions have been made by the Board, as this was all informal discussion. The Board would need to carefully consider such a policy before making any decisions.

A number of years ago, when the National Scrapie Eradication Program began, ADGA worked with USDA to help establish rules that would allow our unique tattoo system to be used for ID purposes of that program, if a copy of the registration paper accompanied the animal. While individual states can enact more restrictive rules, the federal program allows tattoos to be used instead of an ear tag. So, having animals registered can help keep that ID option open for our members to use.

Carpe Diem!
Jan Huffaker
huffaker@rmi.net
www.huffakerfarms.com

This information is from the Hamby Dairy Supply Newsletter. If you have a dairy or need dairy supplies Paul Hamby is the place to go. Cross posted with his permission. www.hamby-dairysupply.com

NAIS National Animal ID. brought to you by the USDA and WTO

There is a lot of new information on the NAIS program. Doreen Hannes has an update for us in this issue of the news. Doreen, who lives in Missouri, has worked tirelessly to stop the NAIS over the past few years. She travels the state talking at town hall meetings, has worked with several legislators in Jeff City MO and does more research on NAIS than any one I know. Progress has been made over the past year, but there are some very troubling signs.

The USDA is now using our children to get this program implemented. USDA made large grants to FFA to get our children to sign up their parents and neighbors farms in this program. At least 3 states now require participation in NAIS to show at the State Fair. The USDA’s butchering of the word ‘voluntary’ is right out of the Bill Clinton playbook on the word ‘is’ At this rate, owning a few livestock will put you in the same class as sex offenders in terms of tagging and tracking you. More on NAIS in Dorreen’s article below

~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

Just Say NO

The NASS National Ag Survey recently arrived in mailboxes across the country. This is perhaps the biggest mailing the USDA has ever done. They increased their database for this mailing by getting addresses from livestock registries, farm magazines, NAIS sign ups, and possibly the FFA and IRS.

There is quite a debate raging over whether you should fill out the survey. The envelope cover has this bold message YOUR RESPONSE IS REQUIRED BY LAW.

But is that true?

The US Constitution requires a count of humans every 10 years. So there is no constitutional authority for this survey.

Congress did authorize an Ag survey every 5 years. This is the third year in a row that the USDA has mailed out an Ag survey under the NASS banner.

I am not a lawyer, but it seems that the NASS and USDA are wasting our tax money on surveys that they have no authority to be making.

An anonymous USDA employee acknowledged that they have never fined or prosecuted someone for not returning a survey.

So, why does the USDA NASS think they can go beyond what Congress authorized them to do?
And why do some people not want to fill out this survey? Here is one writer's opinion;
“... the census data will be abused by USDA. Many of us do not trust USDA because it has used a variety of coercive and misleading methods to implement NAIS. Data mining, outright lies, and misuse of people’s information have left many American farmers with a deep distrust of the agency.” J.M.

TN Bans Private Sale of Sheep & Goats
Dear Y’all,
I’m probably behind the 8-ball. I normally am. Regardless, this morning I discovered something interesting. It is no longer legal to sell sheep or goats in Tennessee. What? Right, it is no longer legal to sell sheep or goats in Tennessee.
I know, you’re thinking I put a tablespoon of crazy in my Cheerios today, but read on. You may view the latest post at http://nonais.org/index.php/2008/01/14/tn-bans-private-sale-of-sheep-goats/ Cheers, walterj (of nonais.org)

NAIS Updates From the Front Line
© Doreen Hannes
On December 19th, 2007, the USDA issued new documents in the Federal Register regarding NAIS. These are the “NAIS Business Plan” and new “User Guide” which you will find at the USDA’s NAIS site, http://animalid.aphis.usda.gov/nais/index.shtml. These documents go hand in hand with the Federal Register notice of July 18th regarding the final rule on AIN’s called, “Livestock Identification; Use of Alternative Numbering Systems”. (search the Federal register for the text)
Reading these documents leaves no doubt as to where NAIS is going and how it will get there. The USDA is to finally be commended for being somewhat forthright in their publications at long last.
To sum it up in a rather succinct fashion, the current game plan is to require compliance with NAIS through the registration of your property as a premise and attachment of NAIS “840” tags to your animals as a requirement of engaging in interstate commerce in any way.
Here are some of the particular points in these documents, NAIS premise registration will be required for movement of livestock across state lines with the required ICVI (interstate certificate of veterinary inspection) See pages 19, 27, 30, 32, 33, 34 and especially page 53 of the Business Plan PDF to read about this for yourself. Please note that if you are reading it on your computer you will need to add 4 pages to the page number I have given.
Of tremendous import, in February of 2008, yes, a few weeks from now, the USDA intends to publish a proposed rule for rolling all animal identification numbering into NAIS compliant “840” numbering. This will include all mandatory disease control programs, including, Brucellosis, Tuberculosis, Pseudo Rabies, Scrapie and Avian Influenza.
To help get all animals (and your real estate) into the program, the USDA will be focusing on having all the breed registries roll their identification into NAIS beginning in March of 2008. I have checked out the American Dairy Goat Association site and on the USDA link it will show a beautiful placement of AIN USAXXXXXXXXXXX (it is indeed 15 characters) for your registered dairy goats. Also of note, membership numbers are conveniently seven digit numbers. I guess it’s a good thing all of my registered goats died in a horrible barn fire.
Please don’t take my sarcasm for surprise in any way. I’m not surprised at all... I am, however, completely disgusted.
Here is one of many excerpts from the Federal register Final Rule on AIN’s from July 18th, 2008 that shows how certain this course of action is for the USDA:
“Because a uniform animal identification numbering system is needed to make the NAIS successful, we do intend that, in the future, only the ‘840’ AIN will be recognized for official use.”
Page 36 of the Business Plan let’s you know that the USDA means business. They contract with the states, and have this to say regarding the Cooperative Agreement, note the last sentence:
“APHIS-VS provides Federal support for NAIS implementation activities and infrastructure within each State, Tribe, or Territory through a Federal funding instrument referred to as a cooperative agreement. This differs from a grant in that grant recipients follow Federal guidelines but are more independent in using the funds. With a cooperative agreement, both parties contribute to the successful completion of the project as outlined in the application and mutually agreed-upon work plan. Cooperative agreement awards require quarterly reporting and engagement of Federal oversight in the successful completion of the goals, objectives, and description of efforts outlined in the work plan.
Beginning with fiscal year 2008, this draft business plan will uniquely serve as a blueprint for the development of work plans associated with NAIS implementation cooperative agreement funding.”
It is important to note that as of this writing, the USDA has no specific authorization to enact the National Animal Identification System. They claim it comes through the AHPA which passed as part of the 2002 Farm Bill, yet there is no specifically granted authority for the Secretary of Agriculture to assign a permanently attached Federal number to your property and call it a premise, nor to require that you electronically identify your animals, nor to require that you report animal movements on or off of your property to any entity whatsoever. If the Senate version of the ‘07 Farm Bill passes through committee as written, NAIS will have it’s first mention in actual statute and that will authorize the USDA to actually do this program.

Cattle are listed as the highest priority in NAIS. This is commensurate with the international guidelines calling for cattle first and then other ruminants. The Business Plan has timelines and benchmark numbers set for cattle and all other species broken down on page 55 of the Business Plan.

Due to space, I will only hit a few salient points from the User Guide. first, the merging of all disease control programs is repeatedly referenced as noted below:

(page 26 of the User Guide pdf)

“The PIN is being incorporated as the standard location identifier in all Federal livestock and poultry disease programs. States and Tribes also have the option of allowing industry organizations or groups or other interested third parties to assist with collecting and entering premises data...”

Trickle down NAIS will move forward easily since many breed registries will incorporate “840” official identification into their registries along with the health paper and disease program roll ins. Remember, it is a felony to remove an official identification device:

(from page 30)

“Producers who purchase animals and bring them into their operation will maintain the official identification already on the animal - no additional identification or change of identification of those animals should occur.”

Note the command form of “will”, it is not the permissive “may” as it would be were NAIS capable of actually being voluntary.

On page 25 there is no allusion to the false “Opt Out” option that USDA was touting as part of it’s attempt to make NAIS into a kinder, gentler, more voluntary program under the first User Guide:

“It is important to remember that the premises identification number (PIN) is assigned permanently to a physical location. If the seller buys a new location to build a new operation that never had livestock, he/she would register that location and obtain a new premises identification number (PIN).”

What this actually does to real estate will probably be decided in a court room. What it does to the Constitutionally guaranteed rights of citizens will certainly be decided in the courts.

The part of NAIS that will remain voluntary is whether or not you desire to engage in commerce of livestock in any way. Hardly anyone will be able to avoid purchasing new breeding stock at some point.

We’ll end up with a bunch of unthrifty inbred stock and have to purchase new stock from black market breeders risking heaven only knows what kinds of fines and penalties should our criminality be discovered.

(page 31 of pdf):

“Some animals do not need to be identified under NAIS, specifically animals whose movement poses a low risk of disease spread or exposure. Such cases include:

Animals that never leave the farm or are only moved directly to custom slaughter for personal consumption do not need to be officially identified. In such cases, these movements have little impact on the potential spread of disease and the traceability, if necessary, is adequate. (State requirements for custom slaughter may differ from this Federal guidance.)

Animals that do not leave their birth premises (e.g., die and are buried at their birthplace) do not need to be identified.”

One last point, there is no mention of any reason to exclude any livestock farm from having a PIN.

It’s my hope that this breakdown is helpful to your understanding of how imminent the threat of NAIS is to your life and livelihood. There are many, many more points that should be covered for full understanding of these documents.

Opponents of NAIS have continually been accused of spreading “misinformation”. When pressed about what it was that we were “misinforming” people about, UnderSecretary Bruce Knight told Ray Cunio, “Don’t believe what you read. Believe what I say”. If you believe that, I have a “NAIS How to Handbook” you should read.

“Sweet Goat Mama”
Carolyn Eddy
www.goattracksmagazine.com