

Executive Report from the NAIS Subcommittee

The NAIS Subcommittee full report and species working group's reports are included in this packet. However the Subcommittee would request action from the SACFAPD on the following key topics of most concern.

1) NAIS Strategic Plan

The Subcommittee reviewed the NAIS Draft Strategic Plan and subsequent updates to the plan. The Subcommittee recognizes the importance of NAIS to protect the US Livestock industry and that timely implementation of NAIS is extremely important. Since implementation of NAIS seems to be focused on the cattle industry it is important that key components of NAIS recommended by the Cattle Working Group are made available as soon as possible.

The Subcommittee recommended USDA keep timelines for all components of NAIS and move forward expeditiously to distribute the AIN 840 series numbering and ISO RFID for the cattle industry.

Based upon a draft cost benefit analysis presented to the Subcommittee in 2005, the public-private partnership outlined by USDA to implement NAIS and producer and industry concerns related to the cost of implementing NAIS, the Subcommittee recommended a cost share program as the most appropriate method to fund implementation of NAIS.

The Subcommittee recommended a 50-50 cost share projection between industry and government.

The Subcommittee recognized that the information contained in the draft cost benefit analysis should be used to define what portions of NAIS should be funded by each segment.

The Subcommittee recommended USDA/Veterinary Services utilize these cost projections in moving the initiative forward as recommendations to the Secretary in defining cost allocations between Federal, States and industry.

Given the present uncertainties associated with implementing a fully operational real-time animal health ID tracking system across all species under a voluntary, "technology neutral" system and, given the uncertainties associated with industry being able to meet self-imposed timelines for database development, testing and implementation of a consensus driven privately managed data base system, USDA should implement a low-cost interim system for NAIS. This interim low cost system can be described as the "Book-ends" approach. Where and when appropriate by species, the animal's individual identification is reported prior to leaving the herd or flock of origin when a change of ownership occurs and the same animals individual identification is also reported at slaughter or death. USDA should have this low cost interim "book-ends" system in place, in the event full implementation of NAIS is not practical at this time or in the foreseeable future, to protect the health and welfare of the nation's livestock industry.

The Subcommittee recommended that USDA shall maintain the AIN allocation and AIN retirement information within the AIN system.

2) NAIS Information system

The Subcommittee reviewed the different components of the NAIS Information system and changes that were made since 2004 in regards to design and oversight of each of the IT components. The Subcommittee feels that by privatizing the animal ID and tracking component of NAIS, increased cost will be placed on producers and industry by having to pay for data management and potential patents that will play a role in data management service charges. The Subcommittee feels producers should be given the choice to either participate in a private or public (state or federal) solution.

The Subcommittee recommended that all producers have the opportunity to utilize a government-managed animal tracking database system under NAIS.

The Subcommittee has received concerns about potential patents that may drive up the cost of NAIS, especially if animal ID and tracking are to be funded by producers. It is important that the patent issue be reviewed so all stakeholders are aware of potential patents and its implications.

The Subcommittee recommended USDA do a complete research of all patents and intellectual properties (IP) pertaining to animal identification issues that could be a potential conflict and/or of relevance to the NAIS and that a summary of such be provided to the Subcommittee. The findings of IPs that are relevant to the tracking database should be made available to industry stakeholders and considered in relation to the potential formation of the legal entity that might establish the private animal tracking database.

The Subcommittee feels strongly that access to the animal ID and tracking databases (ATD's) outlined in the Animal Trace Processing System (ATPS) needs to support state and federal animal health officials in responding to diseases or emergencies in a timely manner.

The Subcommittee recommended that USDA establish the following description for when the State and/or Federal Animal Health Official would access the ATPS to submit a request for information to the ATDs:

- **An investigation of foreign or emerging animal diseases of concern**
- **An animal health emergency as determined by the Secretary of Agriculture and/or State Animal Health Official; or**
- **A need to conduct a traceback/traceforward to determine the origin and distribution of infection for a program disease such as brucellosis and tuberculosis.**

3) Outreach

The Subcommittee is very concerned that the correct messages about NAIS are not reaching producers. Many of the concerns voiced publicly are based on incorrect information or lack of information. NAIS is a public-private partnership. In order to have an adequate level of participation, it is important that states and industry are involved in communications and providing consistent message to producers.

The Subcommittee recommended that USDA leverage its NAIS communication and outreach funds through partnerships with industry organizations to accurately communicate the components of NAIS.

4) Species working group reports

The Subcommittee has reviewed species working group reports. Several reports are still in progress. However, the Cattle, Swine, Sheep and Equine species reports are completed and ready for adoption. The Goat species working group report is not completed. However an interim report is included in this packet.

The Subcommittee recommended that the USDA adopt the Cattle Species Working Group and the Pork Industry Identification Working Group reports with addenda.

The Subcommittee recommended that the USDA adopt the Sheep and Equine Species Working Group reports.

The Subcommittee and industry are concerned that without USDA adoption of the ID technologies proposed by each of the species working groups, implementation of NAIS will not proceed in a timely manner and will cause undue hardship on producers and industry having to facilitate multiple technologies. The Subcommittee feels that a technology standard must be established and serve as a base line, however over time the standards need to be revised in order to adopt new technology.

Following the cattle species working group recommendations, the Subcommittee recommended that the SACFAPD recognize ISO 11784 and 11785 as the immediate RFID standards for the bovine industry and that USDA continue implementation of NAIS within the cattle industry using the RFID performance standards established by the Cattle Species Working Group.

The Subcommittee recommended that USDA APHIS VS establish a process to audit the performance of official identification devices and to ensure that devices meet the established standards that reflect various production environments and use over extended periods of time.

The Subcommittee recommended that the USDA establish an objective process for evaluating new technology and a method for incorporating technology into NAIS that includes open standards (non proprietary) and proven effectiveness. USDA is requested to provide a report by the NIAA ID Info Expo with prior review by the Subcommittee.