



National Milk Producers Federation

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October 5, 2020

U.S. Department of Agriculture
Docket No. APHIS–2020–0022
Regulatory Analysis and Development
PPD, APHIS, Station 3A–03.8
4700 River Road Unit 118,
Riverdale, MD 20737–1238

Re: Use of Radio Frequency Identification Tags as Official Identification in Cattle and Bison (Docket No. APHIS–2020–0022)

The National Milk Producers Federation appreciates the opportunity to provide comments to the United States Department of Agriculture, Animal and Plant Health Inspection Service (USDA-APHIS) on the *Use of Radio Frequency Identification Tags as Official Identification in Cattle and Bison* (Docket No. APHIS–2020–0022). The National Milk Producers Federation (NMPF), based in Arlington, VA, was organized in 1916 to provide a forum for dairy producers and the cooperatives they own to participate in public policy discussions. NMPF advocates policies to Congress, U.S. and foreign government agencies, industry organizations, the news media, and the public.

The dairy industry has taken a strong proactive stance in advocating for official mandatory animal identification to aid disease traceability. In 2005, a coalition of six dairy organizations that serve many thousands of dairy farmers – the American Jersey Cattle Association, Holstein Association USA, Inc., National Association of Animal Breeders, National Dairy Herd Information Association, National Milk Producers Federation and Dairy Calf and Heifer Association – formed a group called *IDairy*TM to collectively advance official mandatory animal identification to aid disease traceability. In 2007, *IDairy*TM was a recipient of a USDA-APHIS cooperative agreement on premise registration and animal ID education which propelled the use of RFID tags in the U.S. dairy industry.

In 2009, the U.S. dairy industry launched the *National Dairy FARM Program: Farmers Assuring Responsible Management*TM (FARM Program) to work with dairy farmers, the producer community and industry partners to show customers and consumers that the dairy industry is takes the very best care of cows and the environment, produces safe, wholesome milk and adheres to the highest standards of workforce development. Today about 98 percent of all dairy farms are enrolled in the FARM Program, which “*recommends using (official) 840-RFID ear tags, which USDA recognizes as an official identification device for the lifetime of an animal.*”

NMPF believes that a national animal identification system can both protect farmers' privacy and allow for immediate access of relevant information in the event of an animal disease or food safety crisis that could endanger the entire dairy chain. We have long

Agri-Mark, Inc.
Associated Milk Producers Inc.
Bongards' Creameries
California Dairies, Inc.
Cayuga Marketing
Cooperative Milk Producers Association
Dairy Farmers of America, Inc.
Ellsworth Cooperative Creamery
FarmFirst Dairy Cooperative
First District Association
Foremost Farms USA
Land O'Lakes, Inc.
Lone Star Milk Producers
Maryland & Virginia Milk Producers Cooperative Association
Michigan Milk Producers Association
Mount Joy Farmers Cooperative Association
Northwest Dairy Association
Oneida-Madison Milk Producers Cooperative Association
Prairie Farms Dairy, Inc.
Premier Milk Inc.
Scioto Cooperative Milk Producers' Association
Select Milk Producers, Inc.
Southeast Milk, Inc.
Tillamook County Creamery Association
United Dairymen of Arizona
Upstate Niagara Cooperative, Inc.

standing policy on official mandatory animal identification to aid disease traceability which states:

- *“the establishment of mandatory animal disease traceability at the earliest possible date for reporting livestock movements in the U.S.;*
- *adoption of International Organization for Standardization (ISO)-compliant radio frequency identification device ear tags for the cattle industry; and*
- *one centrally-managed national database, which facilitates ready access to essential tracking data by all state and federal animal health authorities on a real-time basis, while safeguarding producer confidentiality.”*

NMPF believes that a comprehensive animal disease traceability system is the best protection against a devastating disease outbreak. We appreciated USDA efforts to modernize our disease traceability system to track animals from birth to slaughter using affordable technology that allows for quick tracing of sick and exposed animals to stop disease spread. NMPF supports the overarching animal disease traceability goals that USDA established in September 2018: (1) Advance the electronic sharing of data among Federal and State animal health officials, veterinarians, and industry; including sharing basic animal disease traceability data with the Federal animal health events repository; (2) use electronic identification tags for animals requiring individual identification in order to make the transmission of data more efficient; (3) enhance the ability to track animals from birth to slaughter through a system that allows tracking data points to be connected; and (4) elevate the discussion with States and industry to work toward a system where animal health certificates are electronically transmitted from private veterinarians to State animal health officials.

NMPF does not have the expertise or representation in membership to comment specifically on animal ID and disease traceability for other livestock industries. Rather, we encourage USDA-APHIS to carefully consider comments from those various livestock industries and implications for each sector when finalizing requirements and implementation timelines. Therefore, NMPF supports the USDA-APHIS proposed timeline for implementation for *dairy cattle* of:

- Beginning January 1, 2022, USDA would no longer approve vendors to use the official USDA shield in production of metal ear tags or other ear tags that do not have RFID components.
- On January 1, 2023, RFID tags would become the only identification devices approved as an official eartag for dairy cattle pursuant to § 86.4(a)(1)(i).

- For dairy cattle that have official USDA metal clip tags in place before January 1, 2023, APHIS would recognize the metal tag as an official identification device for the life of the animal.

USDA has spent considerable time and resources to thoughtfully modernize our national animal ID and disease traceability system. Mandatory animal identification and disease traceability serves as a collective industry insurance policy against catastrophic animal disease outbreaks. NMPF commends USDA-APHIS for taking this next step in moving animal identification forward with the use of RFID tags for official animal ID for dairy cattle. We believe the timelines set by USDA-APHIS for implementation are achievable by the U.S. dairy industry.

If you have questions about the comments, please contact me at 703-243-6111 or jjonker@nmpf.org.

Sincerely,

A handwritten signature in purple ink that reads "Jamie Jonker". The signature is written in a cursive, flowing style.

Jamie Jonker, Ph.D.
Vice President, Sustainability & Scientific Affairs