

NAIS + VSPS: Full-Spectrum Surveillance of Farmers

No. 28 in a series of articles about the NAIS and related topics

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Last August, the USDA published a 4-page position paper entitled “Advancing Animal Disease Traceability”. To accomplish this goal, the agency outlined seven implementation strategies which, taken as a whole, would make the data standards and functions of the NAIS mandatory across all species and sectors of the American livestock industry. Strategy #3 gives us a glimpse at what we may have to expect soon, and I quote (my emphasis added):

“Strategy 3: Convergence of Data Standards in Disease Programs and Regulations

USDA will take steps to adopt and apply NAIS data standards to existing disease programs, including international/interstate commerce regulations. For example, national data standards that identify premises importing and exporting livestock, locations participating in official disease control programs, ...”

Implementation of this strategy is currently underway: The USDA has recently announced the purchase of 1.5 million NAIS-compliant RFID tags to the tune of \$1.7 Million in cooperative awards to the tags’ manufacturers. The agency intends to use these tags to begin the retrofitting / conversion process of some of the established disease-control programs (such as brucellosis) so that they will conform to the NAIS data standards. Easily overlooked, however, is the remaining language of this strategy (my emphasis added):

“For example, national data standards that identify... origin and destination premises listed on Interstate Certificates of Veterinary Inspection (ICVI) will greatly enhance existing animal disease tracing and emergency response capabilities.”

If you had any doubts about where the NAIS is headed, the agency’s message is loud and clear: There WILL BE interstate commerce regulations that require the listing of an animal’s origin- and destination-“premises”, physical locations identified by nationally-unique identification numbers which are allocated and managed by the NAIS. This regulatory mandate to list the premises involved will be implemented by way of “*Interstate Certificates of Veterinary Inspection (ICVI)*”. Since all CVIs and ICVIs currently are paper forms that are manually completed/issued by veterinarians, it goes without saying that they will be burdened with added responsibilities, such as accessing the internet and performing data entry. What are the USDA’s plans to get the vets actively involved?

When I recently looked into the USDA’s “partnership” with the *National FFA Organization*, I found a new link on the agency’s main NAIS-website <<http://animalid.aphis.usda.gov/nais/>> that provides access to the agency’s “*Veterinary Services Process Streamlining (VSPS) Application*”. In light of the USDA’s massive, pull-out-all-the-stops, multi-million dollar push towards premises-registration currently underway, will this new “VSPS” system get our veterinarians involved with premises registration, too, a procedure that is being pilot tested by the State of Indiana? The VSPS “Home” page leaves no doubt what this is all about (my emphasis added):

“VSPS provides a consistent and standard method of data capture at all levels and provides data dissemination to the appropriate existing databases. This provides a more comprehensive analysis tool for animal tracking and disease analysis which in turn, would allow [Veterinary Services] to respond quickly to any threats to animal health in the United States.”

It appears that the above mentioned “*consistent and standard method of data capture at all levels*” provided by the VSPS is joined-at-the-hip with the NAIS. The agency’s “About VSPS” page openly explains what this is all about (my emphasis added):

“Veterinary Services Process Streamlining (VSPS) is part of a developing initiative of USDA / APHIS / Veterinary Services (VS). It will offer a single point of access to electronic forms, applications and certification processes required for interstate and international movement of animals and animal products. Designed for Accredited Veterinarians, State and Federal animal health officials, the VSPS contributes to VS’ goals of eGov forms, fulfills the

Government Paperwork Elimination Act (GPEA) initiative and contributes to the 48-hour trace back goal of the National Animal ID System (NAIS) supported by US Animal Health Association (USAHA) since 2000.

The foregoing statements reaffirm what the USDA had stated early on in its draft plans for the NAIS (yet no longer mentions in its current publications): Interstate movement of animals and animal products will eventually become subject to MANDATORY electronic forms, applications and certification processes which will be provided EXCLUSIVELY by the VSPS. This “single point of access” system can only be used via the internet. Here is how the VSPS is being implemented (my emphasis added):

“Once data is captured, targeted information is shared with the VS community to include VS personnel, Accredited Veterinarians, State Animal Health Officials, Importers, Exporters, Brokers, and Agents. Each member of the VS community is able to utilize and analyze data for their particular needs.”

Per the USDA’s definition, the “VS community” mentioned above includes Importers, Veterinarians, Veterinarian Assistants, State Animal Health Officials, Lab Technicians, AVIC Office, Port Officer, USDA/APHIS/VS, and Vet Accreditation HQ. In addition to “data capture”, “information sharing” and “certification processes”, the VSPS system also provides for (my emphasis added):

- *“Links additional data or data sources that are needed to analyze animal/animal product flow with respect to risk of disease.*
- *Integrates with the Government Paper Elimination Act (GPEA) and International Trade Data System (ITDS) eGovernment initiatives.*
- *Provides a one-stop 24/7 source of information for individuals and businesses participating in the international movement of animals and animal products.*
- *Provides individuals and companies involved in the international trade of animal and animal products an electronic format to secure necessary certifications/endorsements.*
- *Completes required forms not in the APHIS ePermits System.*
- *Provides information about the requirements and regulations relevant to the commodity of interest.*
- *Enhances or replaces currently used forms with electronic means of capturing and storing the same data.”*

The foregoing exposition is the short list of what the combination of these two systems, the NAIS plus the VSPS, are about to usher in: an Orwellian-type surveillance infrastructure being imposed upon America’s farmers across the country without their input (there are no published draft or final standards whatsoever) and certainly without their say-so. Important to keep in mind is the fact that the success of the VSPS system – ultimately, the issuance of “electronic” Certificates of Veterinary Inspection – depends largely on the “voluntary” participation of America’s veterinarians. By using one of the modules of the VSPS, veterinarians must first apply for “Accreditation” by the USDA before they can request and have the VSPS system issue / authorize the agency’s new “electronic CVI” (my emphasis added):

“This [VSPS] web-based eInterstate Module for Certificates of Veterinary Inspection (eCVI) and supporting documents are USDA provided at no cost to states and accredited veterinarians.”

This means that any veterinarian that opts not to participate in the VSPS will be shut out from issuing the USDA’s electronic certificates. Likewise, any farmer that opts not to participate in the NAIS will eventually be shut out from selling and/or moving an animal out-of-state, “commercial” activity that requires a new eCVI for every transaction. Since there is at present “no cost to states and accredited veterinarians” for using the agency’s VSPS (and by extension, the NAIS), it is just a matter of time – or convenience – until the states, tribes and vets end up using this system to issue electronic CVIs for sales or movement of animals at the state or tribal level.

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For more information and latest updates, please visit www.FarmersFieldGuide.com

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