

“A Business Plan to Advance Animal Disease Traceability” (Part I)

No. 29 in a series of articles about the NAIS and related topics

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On July 6, 2007, Congress' General Accounting Office (GAO) submitted the results of its investigation of the NAIS [program] to Senator Tom Harkin, Chairman of the Senate Committee on Agriculture, Nutrition and Forestry. In this 84-page report [GAO-07-592], the GAO severely criticized the USDA for failing to properly manage the NAIS project. Summarily, the GAO's 12-month audit found that:

- No implementation priorities are set for the NAIS
- No plans exist to integrate the NAIS with other Federal or state systems
- No “robust” process exists to test, select or standardize animal ID technologies
- Animal-related information is not being stored in the NAIS
- No comprehensive cost estimate exists for the NAIS
- No cost-benefit analysis exists for implementation and maintenance.

These findings were further confirmed by a panel of 32 “animal identification experts” chosen by the GAO auditors from academia (27) and government (5), all of whom are actively involved in NAIS implementation. Amazingly, out of the more than 1.4 Million farmers targeted by the NAIS, not a SINGLE producer was invited by the GAO to participate in its audit of the NAIS! Collectively, the GAO's panel of experts strongly agreed on one major point: that the agency evidently had made a grave mistake in 2006 by backing off from “mandatory” NAIS compliance / participation.

Not surprisingly, the USDA promptly issued a new, 4-page position paper entitled “Advancing Animal Disease Traceability” on August 31, 2007, and recently followed up by releasing a comprehensive, 78-page “Business Plan to Advance Animal Disease Traceability” (the “Plan”) on December 12, 2007. It is this very Plan that actually discloses for the first time, and for everyone to see, what many have suspected all along: the imminent assertion of complete, Federal control over America's animal-husbandry / animal-agriculture and anyone involved therein.

This Plan confirms that the information collected by the NAIS premises registration component is actually being used by the USDA – and by extension, Homeland Security – as an information “template”, an “index” of sorts, to organize and tap into (a.k.a. “data mining”) decades worth of surveillance data collected by the USDA about anything the agency took an interest in: locations, operations, venues, providers of services and products, veterinarians and animals. Notwithstanding the

official justification for the NAIS (mainly to control or eradicate animal diseases) we learn from the Plan that an entire surveillance infrastructure has quietly been put in place by the USDA over time, using a multitude of systems (see Plan, pages 59-63), such as the ...

- **Animal Health and Surveillance Management [System] (AHSM)**, which began information collection in 1977 and contains millions of records about animal-health events for the past 30 years.
- **Emergency Management Response System (EMRS)**, which began information collection in 2003, contains about 90,000 premises records and 225,000 investigation records.
- **Veterinary Services Process Streamlining [System] (VSPTS)**, which began information collection in 1996 and contains hundreds of thousands of movement records that represent millions of animal movements. It also manages the records of about 60,000 records of private veterinarians accredited for Federal work.
- **National Premises Information Repository [System] (NPIR)**, a component of the NAIS, which began information collection in 2004 and to date contains about 420,000 premises records.
- **Standardized Premises Registration System (SPRS)**, a component of the NAIS, which began operation in 2005 and processes premises registrations for about 40 states, numerous tribes, and 2 territories.
- **Compliant Premises Registration Systems (CPRS)**, State-maintained components of the NAIS that connect to and share premises information with the other systems.
- **Animal Identification Number Management System (AINMS)**, which began operation in 2006 and to date contains about 2 million animal-ID records. Once in full use, the system expects 35 million additional record per year.
- **Animal Tracking Database(s) (ATDS)**, components of the NAIS maintained by industry partners since early-2007.
- **Animal Trace Processing System (ATPS)**, a component of the NAIS which began operation in 2007 and taps into and communicates with all the other systems including those maintained by industry partners.

Likely in response to the GAO's criticism, the Plan lays out in great detail 7 specific implementation strategies for the NAIS. To begin with, the Plan prioritizes implementation targets by animal species and [market] sectors:

Type of Location	Total Estimate	Goal	Date	Comments
Exhibitions and Sporting Venues				
County and State Fairs, Racetracks	2750	>90%	Sep. 2009	State, Regional, and National exhibitions
Import/Export Facilities				
Import Quarantine Stations	3	100%	July 2008	Air and Sea
Export Inspection Facilities	30	100%	Oct. 2008	
Ports of Entry	65	100%	Jan. 2008	35—Canada & Mexico, 27—Limited Ports
Markets & Dealers				
Public Auctions (Federal Licensed)	1400	70%	Oct. 2009	
Dealers with Facilities	1988	70%	Oct. 2009	
Harvest Facilities				
Renderers (3D/4D Plants)	155	100%	July 2008	
Slaughter Plants				
• Federal Inspected	826	100%	July 2008	
• Non-Federal Inspected	2116	>90%	Jan. 2009	
Semen Collection and Embryo Transfer Facilities				
Commercial Units	22	100%	Oct. 2008	
Custom Collection	12	100%	Jan. 2009	
Veterinary Clinics (Large Animal Practices that receive livestock)	8000	>90%	Oct. 2008	It is estimated that approximately two-thirds of large-animal veterinarians have clinics that receive animals
Licensed Food Waste Swine Feeding Operations	880	100%	Oct. 2008	

“Tier-1 species include the primary commercial food animal industries – cattle, poultry (chickens and turkeys), swine, sheep and goats. Additionally, horses that, when moved, that require either a test ... or a health certificate ...”

(Note: The Plan classifies all other livestock and remaining poultry species as “Tier-2”, thus lower in implementation priority). Within Tier-1 and for each listed species, individual [market] “sectors” are being prioritized further (high / medium / low) to achieve NAIS-compliance. Example: for Cattle, cow/calf, dairy cows and dairy replacements are ranked as “High”, feeder cattle as “Medium”, and bison as “Low” in implementation priority. As far as the Plan is concerned, “NAIS-compliance” simply means that the data-standards established by the NAIS (namely its nationally-unique Premises Identification Numbers and Animal Identification Numbers) must be used in all every-day transactions – no exceptions.

The above table (see Plan, page 57) illustrates how the agency envisions the above priorities for species and sectors play out in regards to premises registration / NAIS participation.

Accordingly, if for example 100% of Federally inspected slaughter plants are being forced to comply with the NAIS by July 2008, the consequences upon cow/calf producers will be quite drastic: without a NAIS-compliant animal tag, those slaughter plants may have to turn away producers, haulers etc. because the plant must record and report the “location” the animals came from using the NAIS-issued premises and animal identification numbers. Moreover, according to another of the Plan’s strategies, the NAIS data-standard for premises and animal identification numbers will be applied retroactively to any existing, Federally-sponsored or –monitored animal-disease programs such as testing for Bovine TB or Brucellosis. To sum it up: the Plan spells out 32 specific “Strategies and Actions” (see Plan, pages 52-54) which the USDA intends to start, carry out and complete sometime between December 2007 and March 2009.

If this Plan’s 7 implementation strategies are being put in place as scheduled, our pursuit of, or passion for, animal-husbandry / animal-agriculture will no longer be one of the few remaining fundamental freedoms. Instead, this freedom will be converted to becoming a Federally-regulated, “privileged activity” that may only be carried out “at the pleasure” of your Government.

At this time, however, this Plan is still labeled a “DRAFT” plan. Pursuant to the USDA’s announcement in the Federal Register on December 19, 2007 (72 FR 71871), you now have the opportunity to voice your opinion and/or concerns: comments about the Plan or other aspects of the NAIS may be submitted to USDA ...

through the NAIS Web site at:
<http://animalid.aphis.usda.gov/nais/index.shtml>

or by e-mail addressed to:
animalidcomments@aphis.usda.gov

or by mail addressed to:
 NAIS Program Staff, APHIS/VS,
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Bruno & Charlene Schmidt are co-authors of the self-published “Farmer’s Field Guide to the NAIS”. For more information and latest updates, please visit www.FarmersFieldGuide.com