

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

No. 31 in a series of articles about the NAIS and related topics

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On December 12, 2007, the nationwide deployment of the NAIS reached a turning point: the USDA finally published its long-awaited, 78-page “Business Plan to Advance Animal Disease Traceability” (the “Plan”). It spells out step-by-step just how the agency intends to “motivate” over one million farms (69% of America’s 1.4 million farms not yet registered) to “voluntarily” register with the NAIS over the next 12-18 months: not by an act of Congress, nor by force of law or regulation, but by using collateral tactics that effectively put farmers’ livelihood at risk.

Key to understanding such collateral issues is the plan’s “Strategy 3” that seeks to “Standardize Data Elements of Disease Programs to Ensure Compatibility” (Plan, Page 30). A close look at that seven-part strategy reveals, however, that the actual goal reaches far beyond mere “compatibility”: 100% uniformity between the NAIS and all other Federal or state computer systems and databases that store information about premises (farms, operations, auctions and other public venues), barnyard animals (tagging, tracking and disease control), and Ag-related service providers (such as vets, labs, feed stores, haulers etc.)

Once the “NAIS Data Standard” is operational across the board – according to the plan sometime in 2009 – the “PIN” (USDA’s “Nationally Unique Premises Identification Number” provides the MASTER KEY to access every piece of information ever collected about a farm dating back as far as the 1970s!

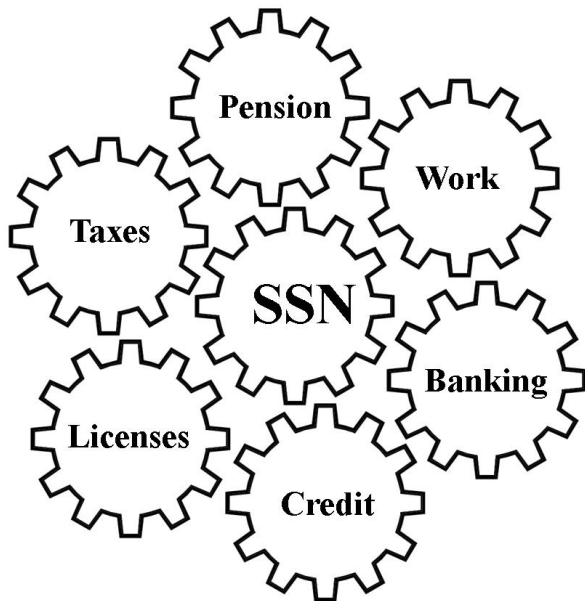


Figure-1: “Social Security Number”

As you can see from Figure-1, above, the concept of a master key is not entirely new. Over the course of the past 75+ years, what began as just a mere account number has since become an

all-connecting master key about a person. Though there has never been a law making that number mandatory, it has become a de-facto standard for Americans that attaches to virtually everything a person needs these days: working, housing, banking, borrowing, licensing, paying taxes, getting insurance, medical care or a pension, among many other uses. Since the SSN provides such a convenient, “interlocking” data relationship among all that information, it is being used routinely and frequently by government to profile / investigate a person without disclosure. Yes, it is true that one can get by without that number, but it is far from easy ...

Will the NAIS Premises Identification Number (PIN) become a similar de-facto master key that attaches to private lands and property (right now just to farms) in much the same way as the SSN attaches to a person’s financial arrangements?

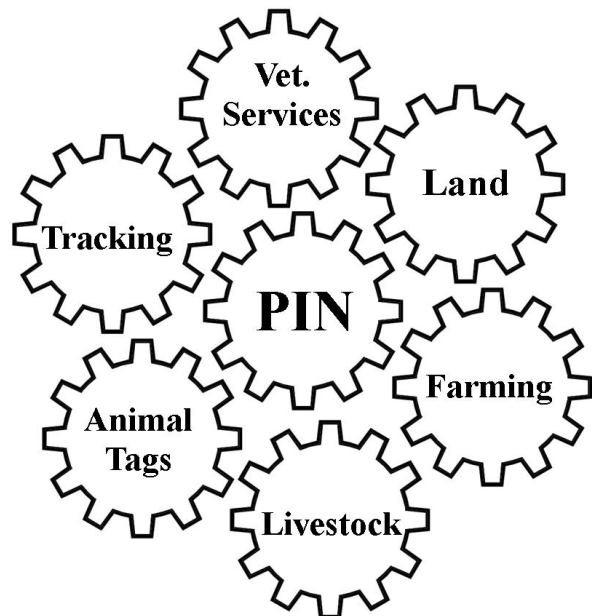


Figure-2: “Premises Identification Number”

Figure-2, above, points out just a few of the areas that revolve around the NAIS master key, the PIN: farm lands and operations, barnyard animals, animal tags, movement reporting, veterinary services (such as inspections, certificates, procedures, lab work, etc.), disease reporting and control, and many other uses yet to be disclosed. As this figure demonstrates, the PIN by its very design provides once again for that “interlocking” data relationship as it correlates all Ag-related activities and information collections.

The NAIS business plan gives us additional clues about what the Federal government – and, by extension, participating state and tribal governments – have planned for America’s farmers.

Strategy-4, "Integrate Automated Data-Capture Technologies with Disease Programs" (on Page 34), tells us that (emphasis added):

"Commonly known as health certificates, [Interstate Certificates of Veterinary Inspection] are required for transporting livestock and poultry across State boundaries. A copy of the document must accompany each shipment. For interstate purposes, this [ICVI] document is intended to inform the State of origination and the State of destination of animals officially identified that have been inspected by an accredited veterinarian and meet specific animal disease requirements for movement eligibility."

The forgoing confirms what we have already learned in 2003 from the original NAIS plan (the USAIP), and from the 2005 NAIS Draft Strategic Plan: that the ICVI would eventually be used by the USDA as its primary instrument to regulate, or crack down on, animal movements.

Completely new, however, is the concept that animals must be inspected by a USDA-accredited veterinarian to be declared "eligible" for and prior to being moved across state lines. Moreover this also tells us that the animal(s), in order to qualify for said eligibility, must also be tagged with the "official" NAIS animal identification number (AIN) which requires that BOTH the source and destination premises be registered with the NAIS!

The domino effect of such collateral pressures is quite apparent: no premises registrations = no AINs = no inspection = no ICVI = thus no eligibility to move animals across state lines. Even more stunning in this regard are the plan's following provisions (also on Page 34, emphasis added):

To facilitate timely transfer of this information document, APHIS-VS has developed an electronic form of this document referred to as an Electronic Certificate of Veterinary Inspection (eCVI). ... In the development of the eCVI, NAIS data standards regarding animal identification and premises identification have been incorporated. ... This standardization is even more important with the continued evolution and development of the eCVI since it applies to all livestock and poultry species in documenting eligibility for movement of animals and animal products, not just a program disease associated with a particular species or livestock industry.

This tells us that in addition to USDA's ICVI-based restrictions on interstate movements of animals, the new eCVI will eventually take the place of the paper-based ICVI, but with several new twists: the eCVI will be issued directly by USDA's database (instead of by the vet of your choice), the NAIS data standards are being enforced without exception and at every step (read: no PIN = no AIN = thus no eCVI), and that an eCVI applies to all livestock and poultry species and not just food animals.

Moreover, the scope of the eCVI is being expanded significantly to not only document movement eligibility of animals, BUT ALSO MOVEMENT ELIGIBILITY OF ANIMAL PRODUCTS!

As has been suspected by many NAIS opponents, the Federal government's agenda for the NAIS is much broader than ever admitted to. The business plan reveals that the NAIS has been positioned to reach way beyond its benign-sounding name, "Animal Identification". Obviously, the direction the NAIS is taking is to also regulate animal products by way of tagging and tracing them from source to destination.

Taken to its ultimate conclusion, the following example clearly exposes the sheer absurdity of this scheme: What happens if I packed felted hats or sweaters knitted from my llamas' fiber on a cross-country plane trip? These "items of concern" are an animal product and llamas are animals subject to the NAIS. Therefore, I would have to get a PIN for my farm; and what of my destination's PIN? I would also have to buy and attach an "official identification device" to my hats and sweaters, then take them to a vet to have them "inspected" for movement "eligibility", have the vet take a fiber samples and send them to a diagnostic lab to have them certified as "disease free", and only then have the USDA send me an eCVI for presentment at the airport to Homeland Security (TSA) so that my luggage might pass muster ... IS THIS WHAT WE ARE LOOKING AT?

How else are we to interpret this plan's sweeping statement, and I repeat:

[the eCVI] applies to all livestock and poultry species in documenting eligibility for movement of animals and animal products, not just a program disease associated with a particular species or livestock industry.

At this time (February 2008), the NAIS business plan is still a "DRAFT". 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:

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4700 River Road Unit 200, Riverdale, MD 20737

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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