

September 29, 2020

USDA APHIS
4700 River Rd,
Riverdale Park, MD
20737

Re: Docket No.: APHIS-2020-0022, Regulatory Analysis and Development, PPD, APHIS, Station 3A-03.8

On behalf of the American Farm Bureau Federation (AFBF), please accept these comments regarding the transition to Radio Frequency Identification (RFID) tags as the official eartag for use in interstate movement of cattle that are required to be identified by the traceability regulations. Farm Bureau represents nearly 6 million family farmers and ranchers, which include cattle producers from all over the United States.

AFBF policy states that any new method of livestock identification should only be considered if it is proven equally practical and effective as current methods and is a legally recognized form of proof of ownership in all states having livestock brand law. Our policy also supports that any animal disease traceability (ADT) program must be as simple and inexpensive as possible for producers to implement. Additionally, AFBF supports USDA implementing a comprehensive educational system for producers on the transition from the National Uniform Ear Tagging System (NUES) to an RFID system for nationwide identification requirements for cattle and bison.

AFBF supports the timeline APHIS has outlined in the transition effective January 1st, 2023, wherein RFID tags would become the only identification devices approved as an official eartag for cattle and bison that are sexually intact and 18 months of age or older, all female dairy cattle of any age and male dairy animals born after March 11, 2013, cattle and bison of any age used for rodeo or recreational events, and cattle or bison of any age used for shows or exhibitions.

AFBF recognizes that the USDA and state animal health agencies tasked with performing livestock traces, are the primary beneficiaries of moving from visual-only tags to RFID tags. As noted in the Federal Register notice in describing traceability test exercises, *“lengthy times in the trace test exercises resulted when numbers from visual (metal) tags were transcribed inaccurately, movement records were not readily available, or information was only retrievable from labor-intensive paper filing systems.”* According to the register notice, moving to RFID tags will improve this. *“RFID tags and electronic record systems provide significant advantage over metal tags to rapidly and accurately read and record tag numbers and retrieve traceability information.”*

AFBF recognizes that the increase in electronic records via RFID tags will benefit animal health agencies in their storage and retrieval of this information. However, this comes at increased costs by those that must tag the animal. Currently, the industry is accustomed to metal brite tags provided at no cost to producers.

While we appreciate USDA currently providing RFID tags free of charge to states and accredited veterinarians, certainty is needed regarding tag funding moving into the future, especially if the use of RFID tags moves from voluntary to required for official identification. Tags should continue to be provided through USDA funding, and USDA should also fund the cost of tag application, data collection,

and data management in order to lessen the burden on the producer. After experiencing great market volatility and low profitability with COVID-19 and other detrimental events leading up to 2020, a new cost mandated from the federal government on cattle producers would be poorly received.

Finally, as industry moves to electronic identification, it is imperative that producer information remain confidential and exempt from disclosure under the Freedom of Information Act (FOIA).

AFBF appreciates the opportunity to comment on the transition to RFID tags. We look forward to working with the agency in implementing a program that is efficient, effective and not cost-prohibitive to our producers.

Sincerely,

A handwritten signature in black ink that reads "Paul Schlegel". The signature is written in a cursive style with a large, looping initial "P".

Paul Schlegel
Vice President, Public Affairs