

Pennsylvania Farm Bureau

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October 5, 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

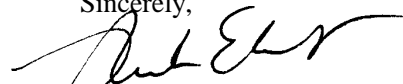
On behalf of Pennsylvania Farm Bureau (PFB), the state's largest general farm organization, we appreciate the opportunity to submit comments for Docket No.: APHIS-2020-0022, Regulatory Analysis and Development, PPD, APHIS, Station 3A-03.8 regarding the transition to Radio Frequency Identification (RFID) tags as the official eartag for use in interstate movement of cattle that are required to be identified by the traceability regulations.

Pennsylvania Farm Bureau supports the comments submitted by the American Farm Bureau Federation dated October 5, 2020 and ask that this support be noted as part of the comment record. Additionally, please note the following:

- *Timeline* – PFB supports the proposed timeline outlined by APHIS to transition to RFID ear tags.
- *Simplicity and Cost* – Any identification program should be as simple and inexpensive as possible for producers to implement. Tags should continue to be provided through USDA funding, and USDA should also fund the cost of tag application, data collection, and data management. This is particularly important as the farm economy and individual farmers struggle under the weight of COVID disruptions.
- *Education* – USDA should provide a comprehensive education system to help producers transition from the National Uniform Ear Tagging System to an RFID system.
- *FOIA* – It is also important that as the industry makes the transition to electronic identification, that producer information remain confidential and exempt from disclosure under the Freedom of Information Act (FOIA).

We appreciate your consideration of Farm Bureau's comments.

Sincerely,



Rick Ebert
President