

## USDA Releases Business Plan

### And Congress Provides Some Funding for NAIS

The USDA has finally officially released its "Business Plan" for how to implement NAIS. It has also released a revised version of its User Guide. You can read the documents on the Liberty Ark website at <http://www.libertyark.net/federal.shtml> (they will be posted tomorrow, 12/21) or the FARFA site: <http://farmandranchfreedom.org/content/Government-documents>

The clear message in both documents is that USDA continues to push forward with NAIS, despite the numerous objections that have been raised. The USDA does not address the many problems with NAIS: the invasion of privacy, burdening of property rights, excessive cost, or the ineffectiveness of the program in the face of real animal health issues. Instead, the only question for USDA appears to be how to push NAIS through despite the protests.

On the Congressional side, the omnibus spending bill that was just passed provided \$9.75 million in funding for NAIS. Although we're disappointed that any funding was provided, this is much less funding than in the last four years. We have made progress, and the next step is to push Congress to stop ALL funding for NAIS.

**TAKE ACTION #1:** Congress is heading home for the holidays. Start the new year off right -- make an appointment to meet with your elected officials! Call your Representative and Senators' district offices. You can find their contact information at [www.congress.org](http://www.congress.org).

Ask to speak to the scheduler, and say that you want to meet with the Representative or Senator after the holidays. If the legislator can't meet with you, ask for a meeting with the district director. Once you have a meeting scheduled, contact us at [noah@libertyark.net](mailto:noah@libertyark.net) for materials to help you explain the issues clearly and effectively.

**TAKE ACTION #2:** Submit written comments on NAIS. As with the publication of Program Standards and Technical Reference earlier this month, USDA again stated that it seeks comments on the released documents or other aspects of NAIS. So you can comment on the new document and all of the many other problems with NAIS. The notice did not include a deadline for comments.

Send your comments to: [animalidcomments@aphis.usda.gov](mailto:animalidcomments@aphis.usda.gov), or by mail to NAIS Program Staff, VS, APHIS, 4700 River Road, Unit 200, Riverdale, MD 20737.

Be sure to send a copy of your comments to your Representative and Senators. It is critical that Congress knows that people are notifying USDA of their objections to NAIS and that your Congressmen understand your objections!

## More Information

You can find the new documents on the FARFA website at <http://farmandranchfreedom.org/content/Government-documents> or on the Liberty Ark website at <http://www.libertyark.net/federal.shtml> (as of tomorrow, 12/21)

There are many problems with these new documents, and we will be submitting comments to USDA and Congress after the holidays. For now, we'll just mention a few highlights:

\* **The "voluntary at the federal level" shell game has gotten even stickier.** USDA now states: "NAIS provides the opportunity for producers that are not part of a disease program to freely participate in national animal health safeguarding efforts." (Business Plan, preface i). The logical corollary of this statement is that NAIS is rapidly becoming NOT voluntary for anyone who IS part of a disease program. As detailed in multiple places in the Business Plan, USDA intends to use existing disease control programs -- including tuberculosis, brucellosis, scrapie, and equine infectious anemia testing -- to impose NAIS on animal owners across the country.

\* **USDA refers to a "critical mass" of 70%.** While at first glance, this may seem to be a sign that USDA is backing away from its unfounded claims that 100% participation is needed, a closer reading shows otherwise. The 70% critical mass is simply a way to gauge "the progress being made towards obtaining the participation levels necessary to achieve the optimum traceability goal." (Business Plan, p.11). What is the "optimum traceability goal"? USDA does not explain in this document, but it has repeatedly claimed NAIS needs 100% participation. In other words, USDA still wants every single livestock and poultry owner in the country to be subject to NAIS.

\* **While various horse groups have claimed that horses will somehow end up being exempt from NAIS, the Business Plan places horses in "Tier 1" as a "targeted species" for implementation.** Moreover, it's not just "competition horses" that will be the target -- it's any horse that would "require a Coggins test of health certificate." (Business Plan, p.14) Some states, such as Texas, require horses to have Coggins tests if they participate in any event (even a trail ride), are sold, or simply are kept within 200 yards of a horse owned by another person. In other words, USDA is placing the vast majority of pleasure horses owned by regular people in the bulls-eye for implementing NAIS.

\* **The USDA continues to ignore the low-cost, practical alternatives for tracing animals, and acts as if a huge federal program is the only solution.** For example, USDA states: "less than half of adult cattle can be associated with any USDA official identification system." (Business Plan, p.18) Where is the data or analysis showing the real-world outcome? Why does identification of animals have to be through an official USDA program in order to address disease? Where are the

studies showing that we need an official federal program to successfully address disease? Experience teaches us otherwise, yet USDA is unwilling to listen or learn.

**\* While pushing NAIS on every livestock and poultry owner, USDA continues to obscure the true extent of the program by relying on the NASS census numbers.** This tactic allows USDA to make NAIS seem more successful than it is (such as by claiming that they have registered 30% of the premises in the country), while also downplaying the number of people NAIS will directly impact. The NASS survey covers only "farms," defined as properties that have \$1,000 or more of agricultural products for sale in the census year. Millions of hobby farms, homesteaders, pet owners (chickens, pot-bellied pigs, etc), and horse owners are not included in the survey -- but they would be included in NAIS.

**We need the millions of people who will be impacted by NAIS to speak up! Download materials to educate people at your local feed store, sales barn, farmers market, or co-op. Contact your legislators and explain the problems with NAIS. Help us stop this program by educating people and speaking up!**

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## **Email and Contact Issues**

**Liberty Ark Supporters:** The Liberty Ark mailing list is still down, which is why you are getting this email through the Farm and Ranch Freedom Alliance. You can reach the Liberty Ark steering committee at [noah@libertyark.net](mailto:noah@libertyark.net) if you have any questions.

**FARFA List:** As always, you can reach us at [info@farmandranchfreedom.org](mailto:info@farmandranchfreedom.org) or 866-687-6452 with any questions.

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Happy Holidays!

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