



National Dairy Herd Improvement Association

Written Statement from

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National Dairy Herd Improvement Association

For the

House Agriculture Committee

Subcommittee on Livestock and Horticulture

Hearing record of July 22, 2004

Regarding the USDA's National Animal Identification System

The National Dairy Herd Improvement Association (NDHIA) appreciates the opportunity to provide these comments for the subcommittee relative to USDA's National Animal Identification System (NAIS). NDHIA supports the implementation of the NAIS, which was based on the animal industry-developed U.S. Animal Identification Plan, (USAIP), to begin a phased approach to fully accomplish the goal of safeguarding animal health. As a part of this process NDHIA strongly supports the need for mandatory premises and animal identification as a foundation for a traceback program to safeguard the national dairy herd. This support includes

Species Standards and Implementation

While NDHIA recognizes the advantages of having a universal, well-defined identification program, we strongly feel that the reality of different management styles and species issues will necessitate flexibility. Certain standards and common issues for identification can be addressed across species; however, some species specific standards and operations must be considered for effective implementation. NAIS should provide the framework for all species.

Technology

NDHIA supports the RFID technology as the best opportunity to assure consistency throughout the dairy industry infrastructure. Future technology developments should continue to be monitored as it becomes available.

Governance

Dairy producer input in developing the guidelines and providing direction to a national premises and animal ID plan is critical to ensure universal adoption and effective operation. On-going review and policy making is an important component of the system. NDHIA recommends that a Review Board be the vehicle that USDA-APHIS implements for governance after the NAIS (former USAIP) Steering Committee completes its work. The Review Board should provide a vehicle for input to help set the direction based on grass roots knowledge. The representatives to the Review Board should be nominated and qualified to serve by the species or sub-species represented. It is important that producers, industry and regulatory representatives are included in the composition of the Review Board.

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Confidentiality

NDHIA believes that very limited and defined access to any database containing specific and limited pieces of premises or animal information offers adequate confidentiality to protect dairy producers. An important fact is that the premises information be location based as opposed to ownership based and held in a separate database. While NDHIA is concerned with the issues of data security and privacy, NDHIA believes the NAIS direction based on the USAIP plan offers reasonable compromise in dealing with these issues. We strongly support that appropriate access to premises and animal information should be on an as-need-to-know basis by animal health officials dealing with animal health surveillance or Foreign Animal Disease outbreaks.

Funding

NDHIA supports the proposed \$33 million designated under the President's FY2005 budget for animal identification and that it be utilized to develop and support infrastructure needed to report data and conduct a traceback. NDHIA also supports the direction of federal funding towards implementation and operation of NAIS before funds are allocated to on-farm hardware. It is vital that adequate funding be provided to maintain the infrastructure for safeguarding the health of the national herd and ensure market access for animal agriculture products.

Summary

During its 99 year history, NDHIA has been involved in premises and animal identification in the role of providing dairy records. NDHIA, partnering with other dairy industry cooperators, such as the National FAIR system and Wisconsin Livestock Identification Consortium, advocates implementation of premises and animal identification on a short timeline. Acceptance of the NAIS system for national premises and animal identification programs will help to facilitate this process. Currently 47% or over 4.2 million of the producing U.S. dairy cattle population is already identified in the DHIA system. These current data and a long history of a well-proven data collection system, utilizing an extensive field force that is in place, provide a solid starting place for contributing to the NAIS system. NDHIA encourages the adaptation of existing infrastructure, including the DHIA system, to avoid duplication of efforts and resources.

The current DHIA system is voluntary, producer driven, utilizes producer governance, and has the trust and confidence of the producer. Utilizing these resources and building on the producer trust will benefit the public and regulatory animal health organizations in safeguarding the health of the national herd.

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