

Comments Concerning Transition to RFID Official Identification Tags

The Montana Board of Livestock are a group of producers appointed by the Governor of Montana to serve as the director of Montana's Department of Livestock. The Department of Livestock is the agency in Montana vested with the responsibility for animal health, animal movement and traceability within the state. The Department works cooperatively with USDA APHIS on these issues and is thankful for the collaboration and funding offered through this relationship.

The Montana Board of Livestock further appreciates the opportunity offered by USDA APHIS to provide comments regarding a proposal where APHIS would only approve Radio Frequency Identification (RFID) as the official eartag for use in interstate movement of cattle that are required to be identified by the traceability regulations. We also are appreciative of the opportunity to comment on the proposed timeline for implementation if this transition occurs. We recognize that quickly and efficiently tracing instances of foreign animal disease to their source is critical to our nation's livestock industry and national security by improving the ability to move products to market, maintain consumer safety from zoonotic disease and participate in international commerce. We appreciate the leadership of USDA in constantly working toward solutions that support and expand the livestock industry.

The Montana Board of Livestock, after reviewing the request, would like to offer the following points and areas of concern regarding the current proposal:

1. While supportive of the need for improvements in animal disease traceability we feel it is premature to move forward with these requirements without making decisions on a standardized national system and the underlying technology in place. Those that are currently using RFID within their operations use a variety of vendors, base technologies and frequencies in their tagging systems. Some uniformity needs to be discussed to avoid unnecessary delays or issues in movement of animals to Interstate markets.
2. Given the issues that Montana and the Greater Yellowstone Area continues to experience with Brucellosis we feel it is short sighted to encourage a move away from required tattoos and metal tags for identification of animals that have been vaccinated. While we recognize that most of the country do not share this concern this is an important tool for Montana ranchers to quickly identify animals that have been vaccinated from those that have not using a visual look over the group.
3. The timing of implementation is directly affected by the ability of USDA APHIS to educate the producer community. The Board of Livestock feels that before moving further down the path to RFID as the only system of traceability, USDA APHIS needs to answer more questions for the producer community:
 - a. While USDA APHIS has a primary role and focus on disease traceability how will or could the information be used for marketing purposes?
 - b. How will USDA APHIS ensure the security of the data it collects? Who will have access to the master data on movements? Can we ensure that private entities or other government agencies will not be able to access and use the data for manipulative purposes?
 - c. Many producers in Montana that use RFID tagging for various reasons have pointed to significant issues with tag retention based on the nature of grazing in challenging geography and

wide-ranging stocking rates on the landscape. Once in place how will replacement tags be handled? What reporting systems will be developed to handle tracking and matching up lost tags as they are moved across state lines to various segments of the industry before slaughter?

d. Currently USDA APHIS has set a precedent by providing financial support in the initial stages of moving toward a growth in the use of an RFID tagging system for traceability. Will this type of support continue? How will costs of such programs be dealt with into the future? Depending upon where you are in the supply chain tagging could mean an increase of input cost and in the current markets even an increase as small as a few dollars per head can have significant impact on an operation's bottom line.

e. What is meant when USDA uses the term "tagging system"? Does that include readers, software and other methods of tracing that would need to be implemented in markets, feedlots or slaughterhouses?

4. The burden to track data by state agencies such as the Montana Department of Livestock could potentially increase as a result of this action. Will any increases in costs or staffing that are incurred by state agencies be reflected in future cooperative agreements with USDA APHIS?

5. The Montana Board of Livestock has been pleased with the ability to use our livestock branding system as a major component of animal disease traceability. We do not feel the current proposal will do much to change the need for that system to serve as a key part of traceability. Since RFID tagging will be required for interstate movement, we will still have a need within Montana to track movement within the state to be able to source and complete investigations. While the national efficiencies are clearer it is debatable how much this will help at the state level concerning both the quality and resources needed to complete traces effectively. Given the integral nature of the use of Brands as ownership verification in Montana state law it is our desire that increased reliance upon RFID tagging systems not undermine the need for and use of livestock brands.

Again, we thank USDA APHIS for the opportunity to provide comment on these critical issues. We share a desire to be able to keep our herds free of disease, protect the consumers of our products and keep the doors of the marketplace open.

Respectfully submitted,

Montana Board of Livestock