



**Comments from Brandy Carter  
CEO of the Kansas Cattlemen's Association**

**May 12, 2009  
*Hearing to Review the National Animal Identification System***

**U.S House of Representatives, Committee on Agriculture, Subcommittee on Livestock, Dairy,  
and Poultry, Committee on Homeland Security, Subcommittee on Emerging Threats,  
Cybersecurity, and Science and Technology.**

Mr. Chairmen and Members of the House Agriculture Committee and Homeland Security Committee,

I appreciate the opportunity to present Kansas Cattlemen's position on the facts as to why a mandatory National Animal Identification System (NAIS) should never be implemented. For as you know, through promotion of good health practices, controlling US borders and enforcing human and animal decontamination processes, the US can be proactive in preventing foreign animal diseases and protect the US consumers' welfare. However, implementing a costly, ineffective NAIS is impractical and will drive independent producers out of business, and the end result will be more consolidation of our industry and less national security of our food supply.

The cost for implementing NAIS in the cattle sector as described in the Benefit Cost-Analysis of the National Animal Identification System is \$175.9 million annually (at a 90 percent participation level). This study states that this significant cost is justified because it is less than one-half of a percent of the retail value of U.S. beef products.<sup>1</sup> However, the cost incurred by NAIS is not by the packers or retailers, but by the producers who receive less than 50 % of the retail value of beef. Beef operations with herds of less than 100 beef cows represent the majority of U.S. beef operations and account for nearly half the beef cows in the United States.<sup>2</sup> And yet, according to the Cost-Benefit Analysis, the smaller the operation, the more costly it will be for the producer. The cattle industry cost represents 91.5 percent of the total cost of NAIS, and identification tags and tagging cattle represent 75 percent of the cattle sector's annual adoption cost. These costs are unreasonable and a burden to all producers.

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<sup>1</sup> U.S. Department of Agriculture, Animal and Plant Health Inspection Service, *Benefit-Cost Analysis of the National Animal Identification System*, January 14, 2009.

[http://animalid.aphis.usda.gov/nais/naislibrary/documents/plans\\_reports/Benefit\\_Cost\\_Analysis\\_NAIS.pdf](http://animalid.aphis.usda.gov/nais/naislibrary/documents/plans_reports/Benefit_Cost_Analysis_NAIS.pdf)

<sup>2</sup> U.S. Department of Agriculture, Economic Research Service, *Animal Production and Marketing Issues: Questions and Answers*, December 1, 2008. <http://www.ers.usda.gov/Briefing/AnimalProducts/questions.htm>