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About the National Animal Identification System (NAIS)
Part 12: The NAIS “User Guide” Exposed

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Evidently prompted by the USDA’s mid-November announcement that “*the NAIS is a voluntary program at the Federal level*”, the “*NAIS is dead*” headline was circulated widely among livestock-related publications just a few days ago. However, if this were truly the case, why would the USDA release its 76-page NAIS “User Guide” on November 22, 2006? According to the Guide’s cover, and again repeated in its Preface, “*The November 2006 User Guide is the most current plan for NAIS and replaces all previously published program documents, including the 2005 Draft Strategic Plan and Draft Program Standards and the 2006 Implementation Strategies.*”

When I read the foregoing, I realized that the NAIS did not suffer the instant [program] death as was alluded to, not at all! Notwithstanding the groundswell of opposition voiced against the NAIS “draft” in recent months, this “draft” system was quietly promoted from the “drawing board” to the computer room. Whether we like it or not, it is a fact that the NAIS is fully operational (per USDA’s website) for registration of premises (all States and Tribes) and the distribution and management of official animal identification numbers ... without any laws authorizing its existence ... without any regulations governing its implementation ... without Congressional oversight ... even without Congressional funding for fiscal 2007! What made this possible? As the User Guide plainly states, the NAIS is a “Federal – State – Industry Partnership” that received 84 Million Dollars in Federal funds to date.

In other words: the NAIS is a BUSINESS ARRANGEMENT, at every level, thus it makes perfect sense for the USDA to emphasize that “*the NAIS is a voluntary program at the Federal level*” – after all, participation in a business arrangement cannot be compelled. Moreover, “*...The NAIS does not need to be mandatory to be effective; we believe the goals of the system can be achieved with a voluntary program. As producers become increasingly aware of the benefits of the NAIS and the level of voluntary participation grows, there will only be less need to make the program mandatory.*” (User Guide, page 4)

With the NAIS being fully operational in regards to Premises Registration and management of Animal IDs, does this “User Guide” really tell us anything new and different, does it provide us with answers to some long-standing, burning questions? Not at all. The “User Guide” does not even come close to what we normally would call an “Owner’s Manual”. Boiled to its essence, the “User Guide” is, first and foremost, a lengthy exposition of the justification for and the purported benefits of the NAIS. It is carefully worded to play into people’s fears about animal diseases. It subtly hints at “animal disease events” that could happen at any moment and suggests that it is the government – and the government alone – that is capable of preventing diseases and staving off disasters, and that the NAIS is the one and only solution to deal with that mission. How could any reasonable person refuse to see the wisdom in that?

Am I making this up? See for yourself ... In order to gain some insight into the subtle messages contained within the “User Guide”, without spending a lot of reading time (70+ pages of fine print), let us examine the count of some frequently used words:

- “state” – 297
- “premises” – 287

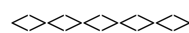
- “identification” – 272
- “producer” – 208
- “disease” – 202
- “registration” – 87
- “federal” – 61
- “industry” – 57
- “tracking” – 47
- “voluntary” – 45
- “tracing” – 42
- “benefit” – 11

How about some frequently used combinations?

- “animal health” – 137
- “animal identification” – 118
- “premises registration” – 78
- “animal disease” – 36
- “premises identification” – 32
- “disease outbreak” – 16
- “disease event” – 16
- “disease response” – 16
- “federal level” – 12

By looking at the 5-6 highest ranked, frequently used words and combinations, it is easy to see that this new “User Guide” is nothing more than a restatement of the USDA’s rhetoric about the NAIS – it adds nothing of substance to, it does not go beyond what we already know: because the NAIS (in and of itself) contains no animal-health related information of any kind, it is being operated solely for the purpose of Federal registration of private land and property. Alas, this new “User Guide” still provides NO DISCLOSURES whatsoever about the legal consequences arising from voluntarily obtaining a U.S. Premises Identification Number (US-PIN), U.S. Animal Identification Number(s), or turning over your information (farm, operation, land, animals and practices) to the NAIS. Moreover, NO DISCLOSURES are provided whatsoever about the terms and conditions that are attached to utilizing the NAIS. Why were these foregoing “essential facts” omitted, facts which are presumed you know about and agree with if and when you “voluntarily” participate in the NAIS?

When I connect these blatant omissions with the prominent role the USDA now places upon the States and Tribes for NAIS implementation, a role the “User Guide” covers in great detail while the earlier publications did not, I recognize a shift in Federal strategy: from here on out, the States and Tribes are charged with aggressively promoting and implementing the NAIS. According to the USDA’s document entitled “*Cooperative Agreements for Implementation of the NAIS*”, released on November 22, 2006, the same day the “User Guide” was published, the USDA gave the States and Tribes free reigns – along with financial incentives to boot – to achieve 100% “voluntary” participation by 2009. Laid side-by-side, these two documents tell us the full story of where the NAIS is headed, and what we can expect soon. Learn more about this in my next essay (Part 13).



Bruno Schmidt is co-author of the self-published “Farmer’s Field Guide to the NAIS”. He has spent in excess of 1000 hours over the past three years researching the National Animal Identification System. For more information and latest updates, please visit www.FarmersFieldGuide.com