

# Country of Origin Labeling and National Animal Identification System – How Will Veterinarians and Their Clients Be Affected?

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## Abstract

Country Of Origin Labeling (COOL) is an industry driven marketing initiative to distinguish meat products produced from animals born, raised and processed in the US from products imported from foreign countries.

The National Animal Identification System is an industry/government driven animal health initiative to establish a standardized national animal identification system to enhance animal disease surveillance, monitoring, control and eradication in the United States.

They are two separate initiatives addressing two separate issues in the livestock industry. However, they do have two common components under discussion:

- voluntary vs. mandatory
- animal identification requirements

As the two proposals evolve, veterinarians and producers will have increased opportunity to develop / expand the veterinarian – client relationship because of the improved recordkeeping, management protocol, identification requirements and reporting of animal movements associated with both initiatives.

## Introduction

Confusion abounds over the two hottest issues in the cattle industry today, Country Of Origin Labeling (COOL) and the National Animal Identification System (NAIS). It depends on who you talk to as to whether COOL is the NAIS or the NAIS is COOL. In reality they are two separate initiatives addressing two separate issues in the livestock industry.

COOL is an industry driven marketing initiative to distinguish meat products produced from animals born, raised and processed in the United States (US) from products imported from foreign countries. The NAIS is an industry/government driven, animal health initiative to establish a standardized national animal identification system to enhance animal disease surveil-

lance, monitoring, control and eradication in the US. However, they do have two common components under discussion. Both contain animal identification requirements and raise the question whether or not should the programs be voluntary or mandatory.

## Country of Origin Labeling

The current Farm Bill directs the Secretary of Agriculture to establish a mandatory Country Of Origin Labeling program for meat, fish and poultry products by September 2004. The Bill also dictates that the Secretary may not impose a mandatory animal identification system as a component of the labeling program. The debate to include a mandatory COOL initiative in the Farm Bill was very intense within the livestock industry and on Capital Hill right up to the time the Bill was passed. The debate grew even more intense and confusing when it was presented to USDA.

USDA's Agriculture Marketing Service has jurisdiction over all meat and poultry labeling regulations. Historic precedence and protocol governing labeling claims is well documented, particularly claims made regarding how livestock have been raised. Producers must maintain verifiable records outlining management schemes that support the claims. Animal identification is a required verifiable element that links the records to the animals producing the products.

During the 2003 legislative session, Congress realized that the COOL initiative in the Farm Bill had many issues needing resolve and subsequently extended the implementation date to September 2006. This sparked an internal industry debate, particularly within the cattle industry, between those producers wanting a mandatory COOL program vs. those wanting a voluntary program.

On Tuesday, June 15, 2004, House Agriculture Committee Chairman Bob Goodlatte (R-VA) and Ranking Minority Member Charles Stenholm (D-TX) introduced the "Food Promotion Act of 2004" (H.R. 4576). The Bill will amend the Agricultural Marketing Act of

1946 to direct the Secretary of Agriculture to establish the voluntary labeling of produce, meat (including beef, pork, veal, lamb) and seafood with country-of-origin information. The labels are aimed at encouraging consumers to choose American products at their supermarkets. The Bill currently has 18 co-sponsors with 325 food groups signed on in support.

## National Animal Identification System

### *Background*

While the history of efforts to develop a national animal identification plan dates back over three decades, most recently the National Institute for Animal Agriculture (NIAA) created and coordinated the efforts of the National Identification Task Force in 2002. More than 70 national livestock industry organizations were invited to participate on the Task Force.

This Task Force developed the National Identification Work Plan (NIWP). This document was presented and accepted by the United States Animal Health Association (USAHA) in October, 2002 as a guideline to establish a national animal identification system to enhance animal disease monitoring, surveillance, control and eradication in the US. USAHA passed a resolution requesting USDA/APHIS to establish a National Identification Development Team (NIDT) that would use the NIWP as a guideline to establish a national plan. The National Identification Development team (NIDT) was named in the spring of 2003. The Team is composed of a Steering Committee and five subcommittees, including: Communications, Governance, Information Technology Standards and Transition.

Throughout 2003 the NIDT, composed of approximately 300 animal and livestock industry professionals representing more than 70 associations, organizations and government agencies, advanced the work plan to produce the initial draft of the US Animal Identification Plan (USAIP).

The USAIP 2003 draft was presented at the USAHA meeting in October 2003. A resolution was passed that accepted the plan as a work in progress, encouraged its further refinement through appointment of various Species Working Groups, requested APHIS to recognize the standards in the plan as official and develop implementation strategies.

In early 2004 various Species Working Groups were established to further develop implementation plans and protocols specific to their industry. These Working Groups presented their reports at the ID INFO Expo 2004 in Chicago in mid-May. (See - Cattle Industry Work Group Report – page 5)

Following the discovery of a cow in Washington State testing positive for Bovine Spongiform Encephalopathy (BSE) on December 23, 2003, Secretary of Agri-

culture Ann Veneman announced that the USDA would implement a national verifiable animal identification system. On April 28, 2004, \$18.8M was transferred from the Commodity Credit Corporation to USD-AAPHIS to initiate the development of the NAIS. The USDA has incorporated the data standards recommended in the USAIP and continues to obtain input to the national program through the Species Working Groups.

### *NAIS Goal*

The goal of the NAIS is to have the capability to identify all animals and premises that had direct contact with a foreign animal disease (FAD) within 48 hours after discovery. The NAIS will provide for a system with the ability to trace back and trace forward animals potentially exposed to a disease of concern. The plan calls for the trace to be completed within 48 hours of the discovering of the disease, thereby helping to contain an animal disease outbreak. Traceback refers to the ability to track an animal's location over its lifespan and the ability to determine which animals may have been in contact with the diseased animal or shared a contaminated feed supply. Trace forward data provides locations of animals moved out of the premises of concern that may have been exposed to the disease. The ability to achieve the 48 hour goal is directly related to the completeness of animal movement data that is reported to the national system. Standards for certain data elements are essential for a successful information system in which data is shared among states and the federal government, as well as being provided or linked through certified commercial service providers. This challenging task will require significant time to develop and establish. The implementation strategy, therefore, reflects a phased-in approach to ensure a workable plan evolves over time through producer and stakeholder input and participation.

USDA-APHIS, along with states and tribes, is responsible for the administration of the NAIS. The Species Working Group reports provide essential detail and direction to the NAIS as the program criteria continues to evolve.

### *Key Data Elements*

#### *Premises Identification*

The 48-hour traceback objective requires that the information system records an animal's or unit of animals' origin and its movement to other locations for its entire life. Such locations are referred to as "premises". Identifying these premises with a single and unique number is essential to trace animals potentially exposed to disease. If more than one premises number is used for the same location, animals subject to contagious disease can go undetected. Therefore, the assignment of a unique number for each premise is essential.

The standard selected to identify premises is a 7 character, alpha-numeric number; example - A123R69.

The Premises Identification Number provides a unique number across the entire US for locations involved in animal agriculture and links that location to the entity that participates in animal production and/or commerce.

The diversity of the environments in which we manage livestock makes the definition of such locations quite complex. From a general perspective, the following defines premises:

“A premises is an identifiable physical location that, in the judgment of the State Animal Health Official or Area Veterinarian in Charge, and when appropriate in consultation with the affected producer, represents a unique and describable geographic entity where activity affecting the health and/or traceability of animals may occur.”

The following general principles apply to the administration of a premises:

- Premises information shall be kept confidential and only partial data will be available to authorized officials.
- A location will maintain the same Premises Number when sold intact. A historic record providing the previous contact information and the dates that information was associated with the premises must be maintained by the state administering the premises record.
- Production locations that have multiple species must have one unique Premises Identification Number.
- Owners with multiple production units and/or holding units will consult with their State Animal Health Official or Area Veterinarian in Charge to determine if multiple premises identification numbers are required. Establishing multiple premises identification numbers should be based on epidemiologic links and/or the likelihood of disease transmission among the premises.
- The owner of the premises, or person designated by the owner of the premises, must register the location(s) and must keep the required information current.

#### *Animal Identification*

Two types or levels of animal ID are necessary to support animal disease management programs:

- individual animal
- group/lot identification.

Individual animal identification is needed for tracking animals that are destined to be commingled

with animals outside of the production system in which they were born as they move through the production chain. While certain traceback functions can be achieved with Premises ID alone, it cannot be used to record an individual animal's movement through multiple marketing and commingling points. In this instance, individual animal identification is necessary.

Group/Lot ID can be used in species where groups of animals are assembled from within the same production system and tracking is achieved through recording of group movements (all-in, all-out) and the maintenance of required production record elements. In the event animals identified through Group/Lot ID become commingled with animals outside the production system, individual animal identification becomes necessary.

#### **Individual Animal Identification Numbers -**

The collective livestock industries agree that a national numbering system is most effective when individual ID is required. However, with several “official” numbering systems in use today, achieving a single national numbering system can only be accomplished through a planned transition.

The standard for the single national numbering system must:

- Be compatible with national numbering systems already established in other countries.
- Avoid duplication of any existing numbers.

The standard selected to identify individual animals is as follows:

the first three digits represent the pre-existing international standard for country code; 840 = USA. These three digits are followed by a 12 digit number starting with 2,000,000,000, resulting in a 15 digit unique number; example - 840212345678901

**Group/Lot Identification** - Group/Lot ID is used in industries where production practices involve management by groups. In such cases, there is no traceback advantage to individual identification. Thus, individual animals will not be identified; instead, groups of animals can be tracked using appropriate group identifiers and production records. A unique and standardized number is necessary to track groups of animals at the national level in a central database. Group/Lot ID is an option for any species in which animals move as a group through the production chain, and when such identification will meet the requirements of 48-hour traceback. Requirements for Group/Lot ID may vary by species. An animal production system can use Group/Lot Identification if the producer is able to demonstrate to the satisfaction of state animal health officials that, through group identification and production records, 48-hour traceback can be accomplished to all premises with animals potentially exposed to disease.

The Group/Lot Identification Number will consist of the Premises Identification Number of the location where the group was established and a six digit numerical number reflecting the date the group was created. Example: premises # A346G79 + date group assembled 09/24/04 = A346G79092404.

### **The US Animal Identification Plan Cattle Industry Working Group Report**

Discussions regarding the development of a national animal Identification system were started in 2002 as a partnership between producers, allied industry, state and federal health officials. It is our sincere hope that the partnership will continue under the following guiding principles:

- The USAIP is endorsed as the uniform national animal identification plan that will be implemented as the National Animal identification System (NAIS). The NAIS will be conducted through cooperative agreements involving USDA-APHIS, state animal health authorities, Tribal Nations and US cattle industry utilizing the recommended USAIP standards for premises ID and (ISO code 11784 based) individual animal ID.
- Producer's data/information must be kept confidential and exempt from current Freedom of Information Act (FOIA) requirements, including a FOIA exemption to block data from passing among varied governmental agencies. Only approved animal health authorities at the federal and state level will have access to the NAIS information system. Only information essential to the enhancement of animal disease surveillance and monitoring shall be stored in any state or federally managed database under the NAIS.
- USDA is encouraged to work cooperatively with all tribal nations with the introductory components, building required infrastructure and the implementation of the NAIS.
- Event(s) that will trigger access to the data management system must be characterized as a regulatory need to accommodate disease traceback / traceforward under one of the following:
  1. A confirmatory positive test for List A diseases.
  2. The declaration of an animal disease emergency by the Secretary of Agriculture.
  3. Program diseases (Brucellosis, TB, etc.) traceback to determine the origin of infection.
- Producers will not bear the full cost of establishing or maintaining the national animal iden-

tification system. The ability to move the NAIS forward in a timely manner and maintain and upgrade the system over time will depend upon significant annual federal funding. During FY 2004 and FY 2005, USDA should move forward to implement a uniform, standardized state premises ID system, including the state premises allocator and state certification standards.

- An extensive industry education effort must be jointly organized and implemented by state, tribal and federal health authorities, livestock organizations, industry's quality assurance programs, allied industry, university extension, etc. This effort must aid in the smooth transition to an identification system that will fundamentally change the way producers handle and process their cattle, and encourage producers to participate in the early stages of implementation.
- "Cooperative Agreements" with individual state, regional multi-state and tribal nations shall be used to support implementation of the NAIS. It is imperative that no state or tribal nation be left behind in the establishment of this national animal identification system.
- Existing state brand inspection systems should be recognized and utilized, whenever possible, for traceback. USDA-APHIS is encouraged to thoroughly investigate opportunities for integrating state brand inspection with the NAIS.
- RFID ear tags (as defined by the USAIP) will be the technology used to individually identify cattle. Consideration should be given to applying a distinct color to the official RFID ear tag so as to readily disclose that the official ID device is intact.
- Following an initial voluntary phase-in and successful implementation testing of the NAIS, the "critical mass" of required infrastructure and adequate federal funding should be in place by 2006. Subsequent assessment of the infrastructure's capabilities for reading, recording and reporting cattle movements from herds of origin to other breeding herds, to exhibitions, to auction markets, to order buying facilities, to backgrounder / feeder, and to post-mortem inspection at packing plants should help determine the number of cattle identified and producers participating. The "critical mass" goal should be set and monitored by state animal health agencies and APHIS during 2006 to determine if the NAIS is meeting the expectations to enhance US animal disease surveillance and monitoring.
- USAIP calls for the ultimate formation of a Livestock Identification Oversight Board, primarily

for producers, the affected livestock industry and animal health authorities to evaluate the overall performance of the NAIS and to make recommendations for improvement. The cattle industry believes this is an important aspect of the NAIS and encourages USDA, states and tribal nations to work cooperatively with the cattle industry to develop an effective structure and function for such an oversight board. The oversight board should be primarily constituted with producers and organizations representing the various species under the NAIS, animal health professionals, marketing agents and packer / processor representation. The oversight board should not be constituted as an advisory committee to USDA since it will serve as an overall evaluation group to address industry and state participation as well as federal involvement with NAIS. The Cattle Industry Work Group supports the development of such a network through the US Animal Health Association's Livestock Identification Committee.

- Evaluation / selection of the initial Cooperative Agreements and their Implementation Test Strategies (pilot projects) supporting the NAIS will be the sole responsibility of USDA-APHIS-VS.
- Implementation of the NIAS will be directed by the establishment of Uniform Methods and Rules.

### Introduction to the NAIS

The NAIS, Cattle Industry Work Group Report provides for methodical progression to track the movement of all cattle from premises as they enter commerce. Introductory steps include implementation test strategies that will enhance an effective and practical implementation. These primary objectives are illustrated in the following charts.

#### Introduction / Funding

To support animal agriculture as a critical infrastructure of the nation's agriculture and food system,

Congress should provide adequate funding to USDA/ APHIS in FY 2005 for the NAIS in an amount no less than \$73 million in new money with the following appropriate stipulations:

- Initiate a national premises ID system in all 50 states.
- Fund validation testing for all species to make sure the NAIS system works.
- Develop and implement a critical infrastructure supporting the collection of cattle movement data.
- Establish the distribution system for the species-specific identification tags.

#### Premises Allocation System

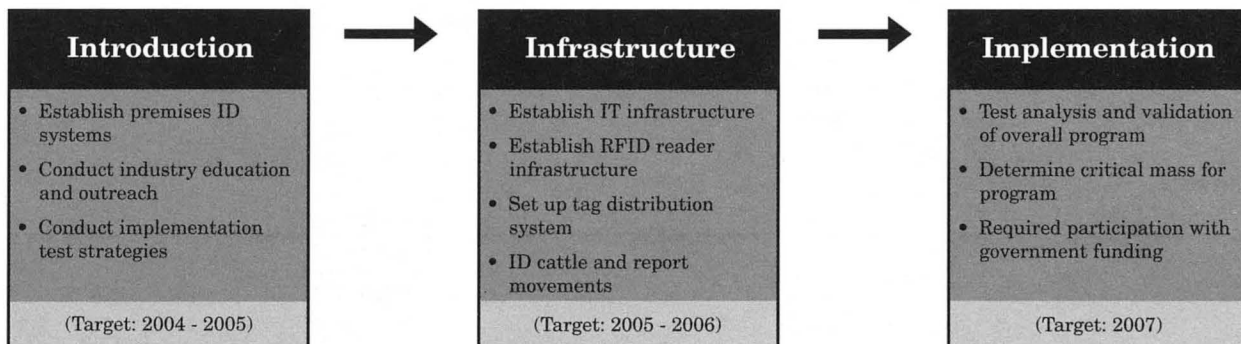
All premises that manage and/or hold cattle are to be identified through the state or tribal animal health authority to achieve a standard national premises system. As noted earlier, premises identification is a prerequisite to individual animal identification, and thus, must be initiated to meet the requirements of the US Animal Identification Number System.

#### NAIS Implementation Test Strategies (pilot projects)

It is the opinion of the Cattle Industry Work Group that the following Implementation Test Strategies, identified to evaluate unique components of the plan, should be given priority status in the selection process.

#### Premises Validation Testing

- Determine the economic impact of implementing the NAIS on the cattle industry.
- Establish and demonstrate the premises allocation system, including but not limited to, conversions of current state imposed premises systems to the NAIS national standard premises system.
- Demonstrate the integration of existing brand state ID systems with the NAIS.
- Demonstrate the relationship between the tribal nations, states and USDA-APHIS in implementing the NAIS.



- Demonstrate the system's ability to maintain normal cattle flow through livestock auctions and subsequent premises, and animal ID reporting along with appropriate buyer information.
- Demonstrate protocol for dealing with non-compliant premises and animal ID.
- Demonstrate recording / reporting protocol for video auctions.
- Outline the responsibilities of the "order buyer" in recording / reporting post-auction sorts and subsequent movements to new premises.

#### *Individual Identification Validation Testing*

- Demonstrate the need and protocol used for "official tagging sites" and/or "certified private tagging companies".
- Document the associated cost of tagging cattle at official tagging sites, certified private tagging companies and livestock auctions, (i.e. logistical flow, labor, liability for injury to man and beast, shrink, etc.).
- Demonstrate current state brand inspection programs ability to accomplish the 48-hour traceback goal.
- Develop the protocol needed to blend existing brand laws with the components of the NAIS, as it relates to individual ID requirements and reporting the movement of cattle from brand law states to non-brand states, and private to public land grazing where commingling occurs.
- Document the number of retags that occur as cattle move through the marketing system due to failures in readability, retention and durability.
- Demonstrate the tracking of retail tag sales and associated cost for AIN managers.
- Determine the feasibility and practicality of incorporating the commercial transportation industry for collecting animal movement data.

#### *Producer Education and Outreach*

The Cattle Working Group strongly encourages USDA to immediately assist in facilitating a uniform producer education and outreach initiative for the NAIS. The message needs to be consistent and clear to all producer, market and animal care segments of the cattle industry. Livestock and farm organizations, university extension, allied industry, livestock auctions, packer / processors and trade media should be encouraged to assist in a coordinated effort.

### **Infrastructure Supporting the NAIS**

#### *Method of Individual Identification*

The USAIP Cattle Working Group (CWG) fully endorses the utilization of ISO compliant RFID ear tags

as the standard for implementing the NAIS in the US cattle industry. The CWG considers RFID ear tags to be the most practical technology today to automate the collection of individual animal identification for cattle. However, the industry remains receptive to other technologies that may prove to be both effective and efficient in either replacing or augmenting RFID.

The RFID code (3 digit country code or manufacture code and 12 digit animal number) imbedded in the transponder is also to be printed on the RFID Tag. Consideration should be given to applying a distinct color to the official RFID ear tag so as to readily disclose that the official ID device is intact. Official RFID ear tags may become available through any qualified person, group or organization that becomes certified by USDA to meet the requirements established for official US Animal Identification Number (USAIN) Managers or USAIN Tag Distributors.

#### *Tag Distribution*

Official identification devices should be distributed under a certified USAIN distributor and be readily available for producers to purchase either through telephone order / drop shipment or the retail sector. All certifiable distribution systems must have the ability to securely associate the USAIN to the appropriate premises number.

#### *Individual Animal Identification Requirements*

Three basic events trigger the need for official individual animal identification:

1. Change of ownership
2. Interstate movement
3. Multiple owners commingle their cattle.

When individual identification is required, the owner / seller is the person ultimately responsible for applying the official RFID tag to the left ear of all individual animals offered for sale, moved interstate or commingled with other owner's cattle. This may be accomplished at the location where the cattle reside prior to change of ownership, at some other intermediate tagging station, or at first point of concentration, but always prior to commingling with other cattle; such as on trucks or trailers, livestock markets, exhibitions, rodeos, or joint grazing agreements.

**Special Note** The combined logistical issues of location, management and transportation may mean that, as a condition of trade, individual ID is installed at some later point at the receiving facility and reported by the buyer for the seller, utilizing only the sellers AIN tags as the official ID.

The establishment of approved tagging services and tagging sites may provide alternatives for produc-

ers to tag their cattle in cases when facilities at one's premises are not available.

Producers are encouraged to identify calves at birth or at the earliest date possible and to report birth dates to the National Animal Identification database to support animal disease issues when the age of an animal is needed. When the precise date of birth is not known, the approximate birth date within 2 to 3 months is recommended. However, the "date of birth" remains an optional field for reporting to the National Animal Identification database. USDA should consider providing a 50-50 cost share incentive toward tag cost if producers officially identify calves at birth and record / report the event in the official database.

Producers are encouraged to utilize and record a second visible tag as a matter of "best management practices". This additional visible tag could enhance day-to-day management needs, and could serve as a cross reference in the event of a lost official tag.

*Exceptions to the Individual ID Requirements Include:*

- Cattle moving under a Brand Inspection Certificate that officially identifies the premises and owner with individual identification occurring at the receiving location, if required.
- Cattle moving to another premises when they remain under the same person's control (ownership) and when they are not co-mingled with cattle from another owner's premises
- When adjoining premises under the same ownership and/or control cross state lines, cattle may move among the premises without requiring official individual identification pending the approval of the respective animal health authorities.

*USAIP Cattle Standards Subcommittee Recommendations for RFID Technologies*

The subcommittee has restricted its activities to RFID technologies using ISO standards 11784 and 11785 as the basis for development of standards for performance of equipment for the collection of animal identification in cattle. The subcommittee has reviewed pertinent national and international performance criteria to serve as the basis for a comprehensive listing of United States standards. As per the USAIP, transponders will have to be evaluated and approved for conforming to the standards by the International Committee on Animal Recording (ICAR).

The subcommittee has established standards for transponders, transceivers and supporting equipment. Most of its activities focus on performance and reliability of transponders as many of the physical and visual characteristic standards have been previously defined in the USAIP structure.

*Reporting Cattle Movements (minimum requirements)*

Three basic events trigger the need for reporting cattle movements:

1. Change of ownership
2. Interstate movement
3. When multiple owners commingle their cattle.

All cattle that change ownership, move interstate, or are commingled with other producer's cattle are to have their official identification and subsequent movement reported to the National Animal Identification Database. Forms of reporting may include Electronic Interstate Certificate of Veterinary Inspection (ICVI), electronic or hardcopy invoice, and/or other methods as deemed appropriate by state animal health authorities.

Reportable commingling includes, but is not limited to cattle commingled with other producers cattle on trucks or trailers, livestock markets, exhibitions, rodeos, joint grazing agreements, etc.

The reporting of cattle movements shall be the sole responsibility of the receiving premises or person responsible for the animals at the receiving premises. The receiving premises are the premises to which animals are moved and at which a responsible party (not necessarily the buyer) is responsible for reporting that identified animals have arrived.

**Special Note** In private treaty transactions, where a marketing agent may not exist, the seller is encouraged to also report such movement events under the NAIS. If the receiving premises fail to report, this self-policing crosscheck will help maintain the integrity of the NAIS, protect against liability of not knowing the final destination premises when cattle are sold, and verify that the reports are accurate and complete.

Required movement events are to be reported within 24 hours or the close of the next business day in order to track all animal movements within the 48 hour goal of the NAIS.

Confirmation shall be available to both the seller and buyer that the reported movement has been entered into the National Animal Identification Database.

State brand inspection programs will continue to play an integral role in the cattle industry. The Cattle Work Group believes that the integration of state brand inspection protocol with the NAIS can work for the benefit of all. To assist in the recognition / integration of the two identification systems, the Work Group recommends that the State Brand Inspection Certificate number be included in the NAIS database.

Private enterprise providers are expected to have a role in supporting the data collection and information system infrastructure. However, the ultimate oversight authority and responsibility for the tracking capabilities of the NAIS information system remains vested with

the USDA-APHIS, tribal nations, state animal health authorities, state animal identification agencies and/or other entities authorized by state law.

*Reporting of Cattle Movements is OPTIONAL (not required) When:*

- Cattle moving within premises or to other premises under the same person's control and / or ownership, even when commingled with other cattle under the same control or ownership.
- When adjoining premises under the same ownership and/or control cross state lines, cattle may move among the premises without officially reporting the movement, pending the approval of the respective animal health authorities.

*Import/Export Identification and Reporting Requirements*

All cattle being exported from the US must be identified with an official NAIS RFID tag prior to being loaded for export. The official tag number, the premises number from where the animal was last received, and the premises number of the export facility must be reported to the NAIS database. The official individual numbers of the animals being exported and the premises ID number of the export facility will also be recorded on the US Origin Health Certificate which accompanies the animal(s) to the country of destination. USDA-APHIS port veterinarians will report to the NAIS Database the official individual numbers of the animals being exported, date of export shipment and validation that the animals have been received at the export destination location.

All cattle arriving into the US must be identified with an official individual number of the country of origin and/or official RFID tag of the country of origin, and be accompanied by a USDA-APHIS approved International Certificate of Identification which shall include a listing of the age and sex of all cattle being imported. If an animal or group of cattle do not contain any official RFID individual animal identification from the country

of origin, the animal(s) shall be off-loaded at the US border, or final destination location, and be individually identified with an official NAIS RFID tag. USDA-APHIS animal health officials or port veterinarians will assume responsibility for reporting to the NAIS Database all official individual numbers of imported cattle with or without RFID tags, including any cross-referenced number on the animals at the time of entry, the date of import, date of tagging with the official NAIS RFID tag (if not previously tagged), premises of last destination prior to being imported into the US and the destination premises within the US where the cattle are to be shipped, with subsequent validation that the cattle have been received at their designated U.S. premises.

### **Conclusion COOL vs. NAIS**

#### **How will they affect veterinarians and their clients?**

Veterinarians and producers will have increased opportunity to develop and expand the veterinarian – client relationship because of the improved recordkeeping, management protocol, identification requirements and reporting of animal movements associated with both initiatives.

Veterinarians will be given the opportunity to become certified NAIS Animal Identification Number (AIN) Managers, serving as a source of official RFID tags for producers.

Veterinarians may be given the opportunity to serve as third party verifiers that proper identification has occurred, particularly as it relates to potential regulatory protocol under COOL and pre-interstate shipment of cattle.

Veterinarians may play a more active role in the interstate shipment of feeder calves through the reporting of such movements via Electronic Interstate Certificate of Veterinary Inspection (ICVI where available), electronic or hardcopy invoice, and/or other methods as deemed appropriate by state animal health authorities.





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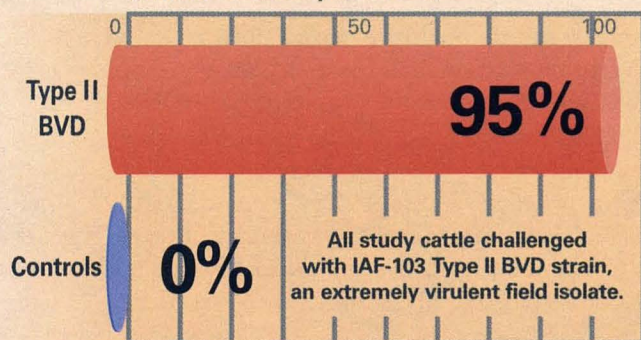
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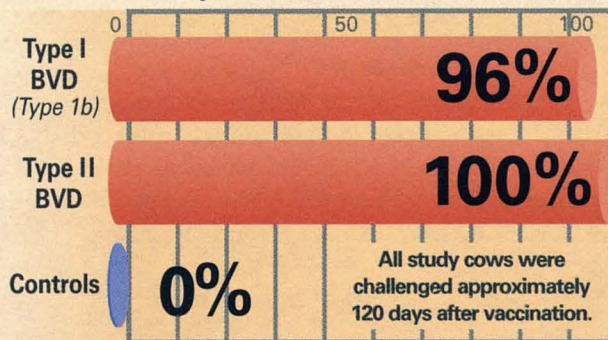
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