

Mr. Chairman and members of the Subcommittee, on behalf of the nation's sheep industry, I greatly appreciate your leadership in conducting this hearing regarding development of an Animal Identification Program.

I am a sheep rancher from Lavina, Montana, and currently serve as President of the Montana Wool Growers Association. Montana is the fifth largest sheep producing state in the nation and my family is proud to be a part of the sheep industry in which we have been active for decades.

Livestock Identification was among the most thoroughly discussed topics at our national board of directors meeting in late January 2004. ASI has been involved with the USAIP since initiation and intends to provide a sheep specific ID plan to USDA APHIS this spring. Our industry has a national animal health program in place that includes a mandatory identification system, namely the Scrapie Eradication Program. We have over 50,000 sheep operations nationwide already enrolled with premise identification and millions of identification tags distributed. This program implemented by regulation in August of 2001 provides the basis for our view and we believe a model for fitting the sheep industry into a national animal ID system.

I believe the policy approved by our board of directors last month best speaks to the points important to our industry on identification. It is as follows:

"ASI endorses the concept of a mandatory national identification program for livestock as outlined by the USAIP Development team, Department of Homeland Security and U.S. Department of Agriculture.

ASI believes that formal rule making on the implementation of a national livestock identification system should include the following and begin immediately in order to communicate and clarify USDA's and other government and animal health regulatory agency needs, requirements and timelines:

- 1) The cost of identification supplies and devices should be provided by the public sector.
- 2) Implementation of a National ID System for livestock in the sheep sector should not be duplicative of the National Scrapie Eradication Program ID requirements and a seamless transition to another system should be planned and announced well ahead of the time with supplies available through well organized distribution channels.
- 3) A National ID System for sheep should accommodate all the various production systems in the U.S. including group movement of owned animals for management purposes as well as movement through feeder and slaughter channels. A readily visible means of identification must be included in a sheep identification system.
- 4) A National ID System should contribute to the management, marketing and business needs

of the U. S. sheep industry.

5) A national ID system for sheep should be thoroughly field tested before implementation to demonstrate the technology is compatible with normal industry operations.

6) Implementation of this system should not economically burden any sector of the U.S. sheep industry."

The system, regardless of the species, ought to be thoroughly reviewed and field tested prior to implementation. This includes the database function which needs to be provided and maintained by the federal government. The overall identification system should be integrated between Federal and state government with industry partners including but not limited to producers, auction markets and processors.

As we see it, the database and tracking functions are both essential, in order to make an overall system effective, but also likely the most difficult to implement. We feel that a premises identification that is tied to the "headquarters" of an operation is key. A great percentage of the sheep in the U.S. graze large expanses of land, some private and some public, and may cross two or more State boundaries during the year.

Again, using the ranch headquarters on the flock as the premises identifier (just as it is currently in the scrapie regulation) should serve as adequate identification for a database requirement and provide practical tracking/traceability.

As a point to reiterate, the cost of the individual identification device and its application per unit of value for a lamb is certainly different than for a steer. A one-dollar tag along with the cost to apply it on a \$125 lamb is considerably more expensive than on a market steer worth many times more in value.

An additional item that is weighing heavily in our sheep ID discussions is the need to identify sheep and lambs by lot or group similar to our feeder and slaughter lambs today under our Scrapie Eradication program requirements. Such a system makes more sense when hundreds of lambs per truckload are moving together through the feedlot and packing plant.

Key issues that I believe must be addressed by the sheep ID group include procedures for lost tags, compatibility of all ID tags and associated equipment on a national basis, and privacy of data collected by in a national animal identification program.

I appreciate this opportunity to discuss the priorities of the sheep industry on this important and somewhat controversial topic. I encourage the Subcommittee and USDA to continue to draw

on the expertise of the industry in designing and implementing a workable program.