



AWI
Animal Welfare Institute



the
greenfield
project

September 25, 2020

Dr. Aaron Scott
Regulatory Analysis and Development
Policy and Program Development, Animal and Plant Health Inspection Service (APHIS)
United States Department of Agriculture (USDA)
Station 3A-03.8
4700 River Road Unit 118,
Riverdale, MD 20737-1238

Submitted via Regulations.gov

RE: Docket No. APHIS-2020-0022; Use of Radio Frequency Identification Tags as Official Identification in Cattle and Bison

Dear Dr. Scott:

On behalf of the Animal Welfare Institute (AWI) and The Greenfield Project (Greenfield), we write in support of APHIS' proposed changes to the Animal Disease Traceability system that would establish radio frequency identification (RFID) tags as the only official eartags to be used in interstate movement of cattle and bison. Additionally, we urge the agency to phase out branding as an official means of identification under 9 C.F.R. § 86.4 based on animal welfare concerns and the availability of more effective and humane alternatives, such as RFID tags.

As the July 6, 2020 Federal Register notice states, a comprehensive and reliable animal disease traceability system is critical to preventing the spread of and eradicating disease among livestock.¹ The widespread use of RFID technology will allow Federal and State animal health officials, veterinarians, and farmers to quickly identify sick or exposed animals which can help prevent the spread of disease and prolonged exposure within a herd, reduce suffering by preventing or identifying and quickly limiting exposure, as well as reduce suffering by decreasing the number of animals that may otherwise need to be euthanized due to the inability to readily identify the source of disease. RFID tags provide numerous advantages for disease traceability, including reliability and efficiency through the centralization of data and information that can be rapidly shared. They also reduce the risk of inaccurate records and data entry errors.

¹ Use of Radio Frequency Identification Tags as Official Identification in Cattle and Bison, 85 Fed. Reg. 40184 (July 6, 2020).

Furthermore, the transition to RFID tags within the livestock industry does not place a heavy burden on producers—APHIS has committed to purchasing up to 8 million RFID tags to be distributed by animal health officials at no cost to producers, and has already distributed more than 1.1 million RFID tags to state veterinarians between January and July of 2020.² In addition to containing the spread of potentially devastating diseases, the widespread use of RFID tags can also help save time and money by potentially reducing the number of animals that need to be tested or euthanized as a precaution, as well as prevent the economic losses which result from having diseased or euthanized herds.

In addition to expanding the use of RFID technology, AWI and Greenfield urge APHIS to phase out its acceptance of branding—which is not only antiquated, but also presents significant animal welfare concerns—as an official means of identification. Hot-iron branding creates a third-degree burn on the animal’s skin that can take at least 8 weeks to heal, during which time the animal experiences pain and distress. One study found that hot-iron branded tissue remained painful and unhealed 71 days after branding occurred.³ This research supports the determination by the American Veterinary Medical Association (AVMA) that “both hot-iron and freeze branding are considered to be painful for ruminants.”⁴ Based on this, the AVMA has recommended that APHIS prioritize the development of alternatives to hot-iron branding.⁵

With the availability of alternative, more humane identification methods⁶ and the ongoing transition to RFID tags, use of an outdated method that is less effective at quickly tracing disease and causes significant pain and distress to the animals is unnecessary and should be phased out.

Thank you for the opportunity to provide input on this proposed rule and for your consideration of our comments.

² APHIS Awards Contracts to Provide up to Eight Million Low-Frequency Radio Frequency Identification Tags to Cattle and Bison Producers, August 12, 2020, available at:

https://www.aphis.usda.gov/aphis/newsroom/stakeholder-info/sa_by_date/sa-2020/sa-08/cattle-tag-contracts

³ Tucker, Cassandra B., et al. "Pain sensitivity and healing of hot-iron cattle brands." *Journal of animal science* 92.12 (2014): 5674-5682.

⁴ AVMA, Animal Welfare Division, Welfare implications of hot-iron branding and its alternatives, April 4, 2011.

⁵ JD Donlin, AVMA comment on Docket No. APHIS-2016-0050, May 23, 2018.

⁶ In addition to RFID tags, tattooing is an alternative method available to producers that costs less, does less damage to the animal’s skin or hide, and is believed to be less painful than branding. See C Nel, Tattooing and ear notching techniques, *Farmers Weekly*, March 20, 2014. See also AVMA, Animal Welfare Division, Welfare implications of hot-iron branding and its alternatives, April 4, 2011.

Sincerely,



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