

NOFA/Mass
411 Sheldon Rd., Barre, MA, 978-355-2853 www.nofamass.org
June 30, 2006

Dear Commissioner Gillespie:

NOFA/Mass would like to respond to the views you have given regarding the National Animal Identification System (NAIS) in the last two issues of the Farm and Market Report.¹

We are aware of concerns about diseases of animal origin, but adopting a program like NAIS will not give us food security. There are far better ways to deal with the problem.

- You seem to take the position that, although consumers are misinformed about the threat of avian influenza (AI) to human health, we should act as if they are right. You say:
"We know that consumption of properly cooked poultry is safe, but...AI has the potential for tremendous economic hardship for agriculture if consumers lose confidence in their food supply."

Is the Department really saying that rather than educate the public about the real (low) level of risk to them from AI and how they can easily protect themselves via proper cooking, we should adopt a national program of animal tracking to prop up consumer confidence?

- You justify the program as a response to mad cow disease (BSE):
"Many question the value of tracking movement of livestock, but the recent positive BSE cow in Alabama demonstrates the need."

But the most effective response to mad cow disease is to test cows upon slaughter. This is widely done in Europe, and is universal in Japan. The test is easy, reliable, and cheap. Why our government has not adopted such routine testing of beef mystifies our foreign customers.

- A little further down in the same column you mention the vulnerability of our food supply to terrorism:
"Much is being discussed about the vulnerability of our food supply, and protection measures are being looked at from farm to fork... I think we all need to fully recognize our vulnerability, and the increased likelihood that the food system will eventually be attacked."

It may be that parts of our food supply are vulnerable, but backyard growers -- who sell to friends and neighbors they have known for years -- are the most stable part of our food system. It is the confinement animal factories, where one event can infect thousands or hundreds of thousands of victims, that is the real threat to our food security.

¹ Douglas P. Gillespie, Commissioner's Column: "A NEW ERA FOR U.S. ANIMAL AGRICULTURE" *Farm & Market Report*, Vol. 83, No. 2, April / May, http://www.mass.gov/agr/news/fmr/2006/06_april_may.htm#commissioner
Douglas P. Gillespie, Commissioner's Column: "HOT ISSUES IN MASSACHUSETTS AGRICULTURE," *Farm & Market Report*, Vol. 83, No. 3, June / July, http://www.mass.gov/agr/news/fmr/2006/06_june_july.htm#commissioner

- In your second column you note how surprised you were by the reactions you got to the first column. You state that, although the premises registration system is currently “voluntary”, it will not remain so for long. Then you drop the bombshell:
 “...we are sharing our premise data with USDA, and registering all animal premises in Massachusetts.”

Is it any wonder that farmers distrust the government after being told that their private premises data has been given over to the federal government, under a “voluntary” program, without their permission or even knowledge?

- Then you try to reassure farmers that:
 “Both the state and federal data is kept confidential, so farmers need not worry about that.”

But I read your column a week or two after hearing of the “loss” of 17.5 million veteran’s files, including their Social Security numbers, by a federal employee who casually took the files home on a laptop. Despite your assurances of “confidentiality”, we do worry.

- You warn farmers about losing markets:
 “Canada and the European Union have all successfully implemented animal ID and tracking, and the US must follow suit or risk losing our export markets for meat products.”

Most animals raised in Massachusetts, however, are enjoyed at home or sold locally and never see export markets. Factory farming and the global trade in animal products are the reason we have such disease threats in the first place.

- Your statements on the costs of NAIS seem contradictory. In your first column you said:
 “The effort is huge, and expensive...”
 But in your second you said NAIS:
 “...is NOT an unnecessary burden on our farmers.

Are we to conclude that NAIS, while a huge, expensive undertaking, is necessary for our farmers? If so, it would be helpful to supply some evidence. But never once in either column do you analyze the cost to the farmer of this program for tagging, reporting, and database management. Nor has there been any effort to compute a cost/benefit tradeoff.

- Ending your second column, you repeat one of the central myths about avian influenza:
 “If and when the H5N1 strain of AI reaches the US, indoor confinement of domestic poultry will be an essential component of disease prevention and containment. Migratory birds will likely carry the disease throughout the US, and limiting our poultry flocks’ exposure to wild birds and their feces only makes common sense.”

But scientists are calling this “wild bird” hypothesis into question.² Evidence shows that, rather than spreading, the H5N1 virus dies out quickly in wild birds because they are dispersed.

2 ²The Transmission of Avian Influenza and the Survival of Free-Rang Poultry Operations,
 <http://www.nofamass.org/programs/nais_info.php>

Despite enormous efforts to track H5N1 infections in wild birds, occurrences have not been nearly as widespread as in factory farm operations. A National Academy of Sciences study has found that: "After testing more than 13,000 wild birds in marshes within bird flu infested provinces in China, scientists identified only six highly pathogenic bird flu viruses in six ducks."³

In May, 2006, the New York Times reported that "Defying the dire predictions of health officials, the flocks of migratory birds that flew south to Africa last fall, then back over Europe in recent weeks did not carry the deadly bird flu virus or spread it during their annual journey, scientists have concluded."⁴

The journal Nature reports: "... a senior animal-health officer at the UN Food and Agricultural Organization (FAO), says he is now skeptical that migrants can carry the virus over long distances."⁵

- The real solution to avian flu is to improve the conditions on factory farms and promote backyard poultry as an alternative to factory farming -- not to outlaw it. Bans on outdoor poultry would only reinforce production at factory farms and push out of business those people who are producing livestock in the most responsible way available: small sustainable and organic farmers.
- Our state Department of Agricultural Resources should respond to the needs of local farmers, not the priorities of the USDA -- influenced as it is by large export companies and global agricultural concerns. Even generous federal grants are no excuse for ignoring the wishes of local growers and animal raisers who are doing an excellent job at a difficult craft.
- We ask that MDAR discontinue uploading premises information to the USDA's NAIS database, and that MDAR fully disclose to the farmers on whom it collects data for what purposes that data is being used.
- We also ask that you publish a short statement from us on NAIS in the next issue of the Farm and Market Report. Thoughtful people can disagree on issues like this, and we think keeping up a dialogue between the Commissioner of the MDAR and one of the state's most rapidly growing farming constituencies is valuable for all of us!

Sincerely,
Jack Kittredge
NOFA/Mass Social Action coordinator

3 [Fowl play: The Poultry Industry's Central Role in the Bird Flu Crisis](#) By Genetic Resources Action International (GRAIN), February 2006, p.5.

4 Migrating Birds Didn't Carry Flu By Elisabeth Rosenthal, New York Times, 5-11-2006.
<<http://www.nytimes.com/2006/05/11/world/europe/11birdflu.html?ex=1148788800&en=6f6d5e9d0b11d860&ei=507>>.

5 Declan Butler, "Blogger reveals China's migratory goose farms near site of flu outbreak," Nature 441, 263 (18 May 2006) <<http://www.nature.com/nature/journal/v441/n7091/full/441263a.html>>. Also available through:

<<http://www.scidev.net/dossiers/index.cfm?fuseaction=dossierReadItem&type=1&itemid=2851&language=1&dossier=24>>