NAIS and Horses – A Timeline of the Inclusion of Horses in NAIS 2002 through 2006

By Karen Nowak

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The issue of national equine ID has been discussed between animal health officials since at least 1987 but did ***NOT*** involve any organization representing the actual horse owning public until 2002. The purpose of this lengthy article is to provide a reference document for the evolution of the plan to include equines in the National Animal Identification System. A "timeline of events" from 2002 through 2006. The inclusion of numerous quotes from actual organizational and government documents is quite deliberate. Those of us who oppose this plan are frequently accused of spreading "misinformation" by the groups who have developed and promote the NAIS. ***This document allows their own words and actions speak for themselves!***

A committee of representatives from the American Association of Equine Practitioners (AAEP) Infectious Diseases Subcommittee on ID, the United States Animal Health Association (USAHA) Equine Infectious Diseases Committee and USAHA Livestock ID Committee plus the National Institute of Animal Agriculture (NIAA) Livestock ID Committee planned an Equine ID Symposium to be held sometime between the already scheduled 1994 and 1998 NIAA ID Symposium. No record has been found that an Equine ID Symposium was actually held during that time frame.

At the Livestock Conservation, Inc (later reorganized as the NIAA) National Farm Animal Identification Symposium in 1998, 3 species groups were created to species-specific issues and needs. These groups were cattle, swine and "other species" (sheep, goats, horses and llamas). The members of these species groups are not identified, however, not a single equine organization is quoted in any of the LCI documents from that symposium.

Reading the membership of the NIAA is like reading a "Who's Who" of corporate agribusiness, animal health officials, animal ID and software tracking companies. There is very little representation of the small farmer.

2002

In early 2002, Dr. Timothy Cordes from the United States Dept of Agriculture (USDA), Veterinary Services Division, announced that an Equine ID Symposium was scheduled for July 2002. To their credit, upon hearing this announcement, the American Horse Council (AHC) decided the Horse Industry MUST be involved in this symposium. It is unclear who and how many of the equine related and breed organizations were notified of this pending symposium, but an attempt was made to have representatives of at least some of these organizations present.

Position statements regarding their stance on a national Equine ID Program were made by the following people/organizations at this symposium:
Amy Mann – American Horse Council
Dr. Tom Lenz – American Association of Equine Practitioners
Dr. Cheryll Frank – USA Equestrian (now known as the US Equestrian Federation)
Ward Stutz – American Quarter Horse Association
Buddy Bishop and Rick Bailey – The Jockey Club
Bob Luehrman – United States Trotting Association
Jim Garrison – Arabian Horse Registry of America
Lili Thomas – BLM Wild Horse & Burro Program
Dr. Mary Giddens – Dutch Warmblood Studbook in North America
Jim Kelley - American Paint Horse Association
Tom Pettry – American Saddlebred Horse Association
Paul Berube and Jim Gowen - Thoroughbred Racing Protective Bureau
Transcripts of all of the above presentations EXCEPT for the American Paint Horse Association and the Thoroughbred Racing Protective Bureau were obtained.

The following four people/organizations communicated a clear pro-National Equine ID Program stance:
Dr. Tom Lenz – American Association of Equine Practitioners

Ward Stutz – American Quarter Horse Association
Lili Thomas – BLM Wild Horse & Burro Program
Dr. Mary Giddens – Dutch Warmblood Studbook in North America
Amy Mann of the American Horse Council communicated a technically neutral stance, however, within a few short months the AHC's pro-NAIS stance became quite clear.
The main objective for the two day Equine ID Symposium was to have participants consider an identification system that (a) would not endorse a specific modality, but (b) would provide for unique and permanent alpha-numeric (computer-compatible) identification for **each** horse/mule/donkey in the USA.

The objectives of the second day were for participants to share their views about a potential national equine ID system, focusing on the positive aspects of such a system, the issues to resolve and how to proceed when this session is over.
The positive aspects identified were:
1) Traceability of horses to allow owners, breed registries and government to track the movements of horses in cases of theft or loss, genetics and performance, and disease tracking respectively.
2) Trade enhancement to help assure trading partners of genetics, performance and health.
3) Integrity of Information to help prevent fraud and help in recovery of animals in cases of theft and natural disasters.
4) Accurate Census to help with national census of animals by breed, location, etc.

A total of 48 issues were identified that would need to be resolved with respect to a national Equine ID Program. Aside from the obvious issues of cost, database control, confidentiality and incentives for horse owners/organizations was a clear intent that a campaign would need to be undertaken to educate the horse owning public about the program and that a feasibility study should be done. As I read through the twelve page summary of the results of the discussion by the actual equine organization representatives, I realized they were right on track.

What happened if they were so on track?

At the end of the symposium, Glenn Slack, then President and CEO of the NIAA, asked the Equine Industry representatives the following question: "Is Equine ID something that needs to be discussed beyond this meeting today?" Seven of the twelve participants voted yes and five voted no.

Three key decisions were made by the NIAA at the end of this symposium:
1. It was decided that the NIAA would establish a study group (to include representatives of industry organizations, the veterinary profession, government and other interested groups) to determine a direction for a national equine identification system
2. The NIAA would report on this issue at the USAHA, AAEP meetings (and other meetings as needed) and will be responsible for championing the study group mentioned above. A report-out will be given at the USAHA meeting in October, but no concrete recommendations/action steps will be presented at that time.
3. Concrete recommendations/action steps to be given at the next national NIAA meeting in April 2003.

A follow up conference call by the Equine ID Symposium Planning Committee was held in September 2002. It was decided that a Study Group be established and that J Amelita Facchiano chair that Study Group. It is important to note that Ms Facchiano was not a representative of any official equine organization or breed registry. She was well known as an advocate of Equine ID for the prevention of horse theft. In addition, she was the Director of Sales and Marketing for GlobalVetLink, LLC, the corporation who developed electronic certificates for veterinary inspection and whose employer was a corporate member of the NIAA.

The USAHA annual meeting was held in October 2002. There is NO mention in the proceedings that the NIAA reported on the July 2002 Equine ID Symposium as had been previously decided. The National Identification Work Plan was presented, which did NOT include horses.

In November 2002, the NIAA established the Equine ID Subcommittee as part of the existing Animal ID and Information Systems Committee. Amy Mann of the AHC was appointed chair and J Amelita Facchiano, co-chair.
Members of the first official NIAA Equine ID Subcommittee were as follows:

Chair: Amy W. Mann, American Horse Council
Vice Chair: J. Amelita Facchiano, GlobalVetLink, LLC
Committee Members:
Coffman, Leroy, Florida Department of Agriculture
Fischer, Glenn, Allflex USA
Fourdraine, Robert, Holstein Association USA
Goldberg, Marty, RMS Research Management Systems, USA, Inc.
Halstead, Steve, Michigan Department of Agriculture
Hammerschmidt, Neil, Wisconsin Livestock ID Consortium

Hwang, Kathleen, EZ-ID/ AVID ID Systems
Jordan, Karen, Dairy Farmers of America
Kelley, Jim, American Paint Horse Association
Marsh, Gary, CowTek, Inc.
Marsh, Stu, Farnam Companies
Mortensen, Ky, American Association of Equine Practitioners
Neale, Spencer, Virginia Farm Bureau Federation
Niedecken, Tim, eMerge Interactive
Notter, Don, Kentucky Department of Agriculture
Owen, Kevin, Digital Angel & Electronic ID
Wade, John, AVID Equine ID

It is disheartening to read that a full 50% of the committee members represented companies who sell animal ID and/or tracking software while only ONE equine breed registry and only ONE equine association were represented. Of the remaining seven members, two represented the dairy industry (who already participates in an ID program) and the remaining five members were animal health officials, who clearly indicated a desire for a national Equine ID program. The question that begs an answer is: "Was this initial effort spearheaded by those who stood to gain financially if such a system were put in place?" Clearly the needs and concerns of the equine industry as a whole were not fairly represented by this committee!

2003

The confusion continues in an AHC Press Release from January 22, 2003 titled "Equine Identification". It states "The issue of a national horse identification system has been discussed in various corners of the horse industry for years, but it wasn't until the American Horse Council's 2002 convention that the issue made its way to the industry's national attention."

"Its sudden rise to importance resulted from a distinct change in the direction of the discussion over equine ID. These discussions had moved away from a focus on monitoring the options available for identifying horses, such as use of lip tattoos, freeze branding, or electronic ID chips, to one of emphasizing the need for a national identification system using electronic chips and a national alpha-numeric system. Supporters of a national identification system maintain that it would benefit the industry making it possible to trace where horses had been in case of a disease outbreak, to prevent horse theft, to help in emergency situations and benefit international trade."

The most revealing statement of the progression of the inclusion of horses in NAIS may be found in the next paragraph of the AHC press release:
"The horse industry as a whole had never been asked to consider the merit of establishing a national alpha-numeric identification system for horses. Yet, at a symposium on equine identification systems, held in July, 2002, there was a clear message that a national ID system for horses was being pushed, and pushed hard, at the industry. It became quite clear at the July meeting that the industry organizations held a strong sentiment that adequate input is needed to determine if a need for such a national system exists. The industry also insisted that any discussion steer clear of endorsing any specific modality for identification."

"A focus group of industry representatives was formed as a result of the July symposium. This group met in January, 2003 with the purpose of looking at whether the potential benefits of a national identification system outweighed the costs and difficulty of instituting one. That meeting reiterated the feeling in the industry that there is a need for more specific information as to why a national identification system for horses would benefit the industry."

The first version of the United States Animal Identification Plan, released in November 2002, the same month that the NIAA Equine ID Subcommittee was officially formed, did NOT include horses. However, version 4.0 of the plan, dated September 29, 2003 DID include horses. Version 4.0 was presented and approved by the USAHA at their annual meeting, held October 9-16, 2003.

While version 4.0 does not use the word "mandatory, the inference that this is the intent may be drawn from their own timeline:

- all states have a premises identification system in place by July, 2004; unique, individual or group/lot numbers be available for issuance by February, 2004;
- all cattle, swine, and small ruminants possess individual or group/lot identification for interstate movement by July, 2005;
- all animals of the remaining species/industries identified above be in similar compliance by July, 2006.

A review of the minutes from the many organizational meetings during this time frame confirms this. In every discussion, the theme that a voluntary program is "doomed to fail" is repeated.

An October 2003 Press Release from the AHC titled "National Identification System for Horses Debated at AHC Meeting", states that "Speakers from the U.S. Department of Agriculture (USDA) and equine organizations continued the discussion at the recent AHC Annual Meeting in Washington, DC. While no consensus on the need for a national ID system for horses was reached, it was apparent that there is an interest in the industry's continuing to explore the pros-and-cons of such a system."

The mystery is ***who*** was interested in continuing to explore this and ***what was their rationale***?

Dr. Valerie Ragan, Assistant Deputy Administrator, Veterinary Services, U.S. Department of Agriculture (USDA), is quoted as stating "plans are progressing rapidly at this point in the other livestock sectors. The focus is "on cattle and swine at the present time because those species are at the highest risks for disease situations. We are not developing an equine identification system, we are not even there yet," Yet, further on in her presentation she noted that there are plans "to expand into other sectors, like equine and aquaculture. Nothing is mandatory at this stage. We must have a system in place that is tried, and tested and proven and there is a reason for it before it might be made mandatory," she concluded. "We will be developing this and we encourage you to look at this effort and decide if you want to join in. We are happy to work with you if you do."

Jim Gowen of the Thoroughbred Racing Protective Bureau (TRPB) summed it up best. The following is a direct quote from the AHC October 2003 Press Release:
"'I will take the opposing view on national ID,' said Gowen. He noted that the TRPB has participated in conferences and discussions regarding this broad area for over a year and has heard from some federal and state officials that the system is supported by 'the horse industry.' The term has been used regularly by supporters, 'but too loosely given the breadth of those involved in the industry, the different types and uses of horses. Who is calling for and promoting this idea? ***It seems to us that at this point it is being pushed by an ad hoc group of individuals with equine business interests who can hardly be called representatives of the industry***', he suggested.

'In short, we see no compelling reason for a national ID system for horses. We see no reason to expend further energies on this issue. But we realize that others have a different view. For this reason, we believe that any continuing discussions should be within the horse industry itself. Once this is done, a clearer picture may emerge as to how important National ID actually is,' Gowen concluded."

A second press release was issued by the American Horse Council on the same date titled "AHC to Organize Task Force on National ID System for Horses". It states "Although there was no consensus reached on the need for a national ID system, there was agreement that the AHC should organize an Equine Identification Task Force to continue to inform, involve and educate the industry about the issues surrounding the potential of a national identification system for horses with the goal of arriving at some consensus."

"Other livestock groups have been debating the issues surrounding a national identification system for their animals for over ten years and have reached a general consensus that a system is needed. These other sectors are considering the implementation of a universal system that would be alpha-numeric, permanent, unique, and in addition to and integrated with existing systems already being used. But the value of any such system to the horse industry, which has different needs and different challenges, has not been fully explored. That will be one of the purposes of the ID Task Force."

The following organizations were members of the AHC Equine ID Task Force, created in October 2003:
American Association of Equine Practitioners
American Endurance Ride Conference
American Miniature Horse Association
American Paint Horse Association
American Quarter Horse Association
American Saddlebred Horse Association
Arabian Horse Association
Back Country Horsemen of America
California Thoroughbred Breeders Association
Harness Tracks of America
Kentucky Thoroughbred Association
Mersant International Ltd.(commercial horse transporter, sponsors horse races)
NA/KWPN - Dutch Warmblood Studbook in North America
National Cutting Horse Association
National Reining Horse Association

National Thoroughbred Racing Association
Palomino Horse Breeders of America
Professional Rodeo Cowboys Association
Tennessee Walking Horse Breeders' & Exhibitors' Association
The Jockey Club
National Horsemen's Benevolence & Protective Association (racing industry)
Thoroughbred Owners & Breeders Association
Thoroughbred Racing Protective Bureau
US Trotting Association
US Equestrian Federation
Western Stock Show Association

Of interest, while all these meetings and discussions were taking place, nothing was published on the AHC website until December 6, 2003. It is highly possible that this was quite deliberate, to keep it under the radar from the NIAA. Last, it is not clear if this information was actually submitted for publication in any horse related publications.

Both of the above quoted press releases were dated October 2003 but it is unclear who they were released to. They were not published on the AHC website until February 9, 2004.

2004

The AHC Equine ID Task Force met on January 16, 2004 in Los Angeles and again on March 18, 2004 in Dallas Texas. Four subcommittees were designated: Horse ID & Technology, Premises ID, Movement & Tracking and Communications. The AHC Equine ID Task Force evolved into the USAIP Equine Species Work Group in early 2004.

In 2004, twenty-four representatives of horse organizations met with then Secretary of Agriculture Ann Veneman. The results of that meeting were published on May 4, 2004 in an AHC memorandum to "AHC Industry Members". The portion of this memo pertaining to NAIS is reprinted below (I have bolded portions of the text for emphasis):

"Two dozen horse industry leaders met with Department of Agriculture Secretary Ann Veneman in her office during the National Issues Forum of the American Horse Council. The meeting lasted 45 minutes and Secretary Veneman was very interested, engaged and generous with her time. USDA Under Secretary Bill Hawks, Deputy Under Secretary Floyd Gaibler, and Chief of Staff Dale Moore were also present. The meeting provided the industry representatives with an opportunity to explain to the Secretary and her staff the economic importance of the horse industry; how we are participating in the Department's initiative to develop a national identification system for livestock; our efforts to make horses eligible for federal disaster assistance; and the importance of the USDA's upcoming meetings with our European Union trading partners.

National Animal Identification and the Horse Industry

Several members of the AHC Task Force on Equine Identification were present and updated the Secretary on the involvement of the horse industry in the Department's efforts to institute a national ID system for livestock in case of a disease outbreak.

Dan Fick, of The Jockey Club and chair of the Task Force, explained that the ***horse industry had held several meetings and saw benefits to a national identification system involving the horse industry***. He noted that there were still many critical issues to be considered and resolved.

Dr. Jim Morehead, of the American Association of Equine Practitioners and chair of the Premises ID Subcommittee of the Task Force, explained that one of the many difficult issues to be fleshed out was the definition of a "premises" for the horse industry. He explained that under the proposed ID system a "premises" for the horse industry could be quite different from that for other livestock groups. Dr. Morehead noted that there could be many more locations involved and that the Subcommittee was trying to define such locations and identify the potential responsibilities of any "premises manager" under a national identification system.

Ward Stutz, of the American Quarter Horse Association and chair of the Tracking/Movement Subcommittee, explained that horses move more frequently than other animals and often individually, thus making the task of tracking their movement difficult.

Dr. Mary Giddens, of the Dutch Warmblood Stud Book in North America and a member of the ID Number and Technology Subcommittee, explained that ***the industry was trying to determine what numbers could be used*** for the national system, noting that the Universal Equine Life Number was certainly part of the mix.

Cindy Schonholtz, of the professional Rodeo Cowboys Association and chair of the Subcommittee on Communications, told the Secretary that *explaining the national ID plan, what was being proposed, its current status and how it would apply to the horse industry was a very important task and that the industry was doing this*.

Ms. Schonholtz also explained that the confidentiality of any information collected through the system was very important to the horse industry. An exemption from the Freedom of Information Act (FOIA) should be ensured before any system is mandated, she suggested.

Amy Mann, of the AHC, also noted that the cost of a national identification system would be considerable. She suggested that federal funds to assist livestock sectors to set up and operate a system would be essential to any program's success.

The Secretary expressed appreciation for the industry's involvement. She agreed that there seemed to be confusion among some horse owners about the ID system, *noting that many of the comments that the USDA had received from horse owners on the national animal identification plan indicated a misunderstanding as to what was being proposed*. Secretary Veneman also said that a voluntary system would be initiated before a mandatory system was instituted by USDA. The Secretary also noted that confidentiality was a primary concern of the Department, as was cost and funding."

I was stunned when I read this for who knew the USDA was soliciting comments from horse owners in *2004*? At that time I subscribed to no less than 5 national horse magazines and 2 farming publications and not once did I read anything about horses and NAIS!

At the end of the memo is a listing of the "industry leaders" who were present for the meeting with Secretary Veneman:
Jim Barton - American Quarter Horse Association – AHC Trustee
Dr. Marvin Beeman - American Association of Equine Practitioners – AHC Trustee
Dr. Jerry Black – American Association of Equine Practitioners – AHC Trustee
Dr. Larry Bramlage - American Association of Equine Practitioners
Tim Case - American Quarter Horse Association
Dan Fick - The Jockey Club
David Foley – Ex. Director - American Association of Equine Practitioners
Dr. Mary Giddens - Dutch Warmblood Stud Book in North America
Jay Hickey – President – American Horse Council
Amy Mann – Director of Health and Reg. Affairs – American Horse Council
Dr. Jim Morehead - American Association of Equine Practitioners
Fred Noe – Executive Vice President – US Trotting Association
Cindy Schonholtz - Professional Rodeo Cowboys Association
Jim Shoemake – American Quarter Horse Association – AHC Trustee
Eric Strauss – US Equestrian Federation – AHC Trustee
Ward Stutz - American Quarter Horse Association
David Switzer – Kentucky Thoroughbred Association
Dr. Peter Timmoney – Dept. of Veterinary Science, University of Kentucky
Scoop Vessels - American Quarter Horse Association
Jerry Windham - American Quarter Horse Association – AHC Trust

It is more than apparent that the only individuals who were aware of NAIS, much less how far it had progressed, were members of the American Horse Council.

In May of 2004, Amy Mann presented the Equine Species Working Group report at the NIAA ID Info Expo.
Ms Mann listed the following benefits of a national equine ID system for the Horse Industry:

- Reduce potential effect and enhance control of equine disease outbreaks.
- Maintain equine commerce and movement of horses in the case of a disease outbreak.
- Assist equestrian events in ensuring a healthy environment for participating horses.
- Expedite recovery and identification of horses in case of loss due to natural disaster, theft or accident.
- Facilitate import and export of equines.
- Uphold the horse industry as a responsible member of the livestock community.
- Enhance the permanent identification of horses and assist in tracking ownership.

Ms Mann made it quite clear that the US Horse Industry should develop the national ID plan for horses.

She presented a list of what movements may need to be tracked:

- Interstate Commerce
- When Health Certificates are required.
- When horses go to:
    - □ Racetracks
    - □ Horse Shows
    - □ Horse Auctions
    - □ Trail Rides
    - □ Rodeos
    - □ Arena Events
    - □ Breeding
    - □ Veterinary Clinics

The issue of where the database should be kept was also discussed with no final answer. Areas being explored were the national USAIP database, a centralized equine database developed by the Equine Industry itself, breed registries, performance databases and finally the possible need to create a non-registered horse registry for those not registered through a breed organization. The issue of the large number of unregistered horses/horses sold without papers, and therefore no official identification, has apparently been a driving force behind the initial question of whether or not horses needed to be included in a national database.

The issues of cost and who will pay for this system were raised without any definitive answer in writing.
She concluded her presentation by stating that the Horse ID & Technology, Premises ID, Movement & Tracking, and Communications subcommittees would continue to address agendas and that they plan to develop project proposal on May 25, 2004.
The next Equine Species Working Group Meeting was scheduled for June 21-22, 2004 in Dallas/Ft. Worth.

In August 2004, the American Horse Council's Equine ID Task Force/USAIP Equine Species Working became the USDA Equine Species Working Group.

In December of 2004, the ESWG submitted their first set of recommendations to the USDA regarding horses in the NAIS:
Recommendation #1: All horses are susceptible to equine infectious diseases. Any horses that are transported interstate, or commingled with other horses or livestock intrastate must be identified with an official form of identification.

Recommendation #2: Any national or state equine identification program should be voluntary in the initial implementation period to insure the opportunity to properly test the components of the system, and allow sufficient time for an educational campaign on the parameters and benefits of the program to increase participation. Provided FOIA issues are resolved to industry satisfaction, mandatory equine identification should not be implemented before 2010 unless events necessitate earlier compliance.

Recommendation #3: Horses are livestock, and should be held to the same standards as other livestock species. However, the USDA must recognize the unique characteristics of the equine industry in the development of NAIS. With respect to the other species in the NAIS, horses are different. Case in point, horses:

- Have longest life expectancy of livestock species (20 –35 years).
- Are generally more valuable on an individual basis.
- Are transported more often and for greater distances.
- Participate in internationally recognized competitions including the Olympics.
- Require accurate identification to insure the integrity of a multi-billion dollar racing industry with state regulated pari-mutual wagering.
- Are imported and exported on a regularly basis at significant expense.
- Are at great risk of theft.
- And, are in many instances already properly identified by the appropriate breed registry or horse identification services.

Recommendation #4: The components of a national horse identification program which provides for horse identification, traceability and trace-back should provide definitive benefits to equine industry that justify the costs to stakeholders.

Recommendation #5: In order to have the option to have a national equine identification program that is internationally compatible and especially with Canada and Mexico, the ESWG must work in close cooperation with the Animal Identification Number (AIN) Managers for equines. The appropriate equine registries and other databases recording the identification of equines should be designated as AIN distributors, and immediately notified when an AIN is assigned to a specific equine.

Recommendation #6: Horse identification data/information must be kept confidential and exempt from current FOIA requirements including a FOIA exemption to block data from passing among varied governmental agencies. Only approved federal and state animal health authorities will have access to any state or federally managed database where the NAIS information essential to the enhancement of animal disease surveillance and monitoring is maintained.

Recommendation #7: Definition of Equine Premises: An equine premise is an identifiable physical location that represents a unique and describable geographic location where horses are boarded, stabled, or kept with other horses.

Recommendation #8: The identification of certain equine premises is at a higher priority with respect to potential for disease transmission, and therefore requires greater disease monitoring and surveillance. The following list is prioritized to represent equine premises for reporting purposes, including but not limited to:

- Ports of Entry
- Quarantine Facilities
- Auctions and Sales
- Breeding Farms
- Boarding Facilities
- Training Facilities
- Equine Clinics and Hospitals
- Racetracks
- Show/Exhibition/Competition Facilities
- Public and Private Stables
- Rodeo Arenas
- Fairgrounds
- National or State Parks
- Universities (Educational/Research Facilities/Diagnostic Laboratories)
- Ports of Exit
- Dude Ranches

Recommendation #9: The premises manager is the owner or his/her designee who is responsible for recording and reporting the identification of horses moved onto or off of the premises; and must submit the necessary information (premises identification, horse identification numbers, time and date of entry and exit, and event code) to the national database in a timely basis as designated by USDA NAIS. The premises manager must submit the information to the national database within 24 hours of being notified of a disease outbreak that threatens horses.

Recommendation #10: When horses are transported interstate, intrastate when commingled with other horses or livestock, or to premises or events where a Certificate of Veterinary Inspection (CVI) or other equine health papers such as Coggins are required, the movement must be reported to the appropriate USDA NAIS database(s).

Recommendation #11: To enhance disease surveillance through a successful identification and tracking program, standardized requirements for Certificate of Veterinary Inspection (CVI) must be established among the states. At the time of veterinary inspection, any horse that has not been previously identified or assigned an Animal Identification Number shall be identified with an official form of identification that includes the animal identification number, any electronic identification and a more complete description of the horse's coat color, white markings, any unique identifying marks including cowlicks, brands and tattoos; and whenever possible, digital photographs.

Recommendation #12: Those with inquiries, recommendations or grant proposals pertaining to a national equine identification program should be encouraged to contact to the Equine Species Working Group for collaboration.

Recommendation #13: Whenever appropriate, equine identification systems currently in use should be incorporated into the national equine identification program. All equine identification technologies shall be immediately readable, modality neutral, computer compatible and be unique to and an integral part of the horse, including but not limited to:

- Brands that identify a specific horse
- Lip Tattoo
- RFID (radio frequency identification devices)

Microchips are a cost efficient, readily available equine identification method already in use in equines. Existing microchip technologies should be incorporated into the NAIS for equines. New technologies in ISO compliant microchips may be more easily associated with the Animal Identification Number, but should not be introduced without a sufficient inventory to meet demand and the corresponding distribution of compatible, ISO compliant microchip readers.

Recommendation #14: New technologies should be pursued and researched to provide more efficient, cost effective and accurate methods of equine identification, i.e., Biometrics, DNA Testing, etc.

Recommendation #15: To ensure that the horse owners and industry stakeholders do not unduly bear the costs of the development and implementation of a national equine identification program, the USDA should provide adequate funding in 2005-2006 for cooperative agreements with states and tribes that include equine field trials recommended by the ESWG, and adequate funding in 2006-2007 for assistance to begin implementation of the National Equine Identification Program.

Recommendation #16: The ESWG should be allowed to contract with a consortium of horse industry stakeholders to design, develop and maintain an independent equine industry database for equine data/information necessary to provide horse identification, traceability and trace-back capabilities for the NAIS.

2005

On May 6, 2005 the USDA published the NAIS Draft Strategic Plan and Draft Program Standards in the Federal Register. Now the intent for a mandatory system is clear:

Key milestones:

- July 2005: All States capable of premises registration.
- July 2005: Animal Identification Number system operational.
- April 2007: Premises registration and animal identification "alerts".
- January 2008: Premises registration and animal identification required.
- January 2009: Reporting of defined animal movements required; ***entire program mandatory***.

On May 25, 2005, the ESWG submitted their second set of recommendations to the USDA regarding horses in the NAIS. They were identical to the December 2004 recommendations EXCEPT recommendation 13 was changed as follows:
"Recommendation #13: Whenever appropriate, equine identification systems currently in use should be incorporated into the national equine identification program, especially radio frequency identification devices (RFID), normally microchips. Existing microchips should be incorporated into the NAIS for equines.

From this date forward, the ISO/ANSI compatible RFID chip (11784/85, 134.2 kHz) is the recommended standard of electronic equine identification for the purpose of disease control for the uniformity and compatibility necessary to successfully achieve the goals of the USDA National Animal Identification System.

The recommended implantation site for the microchip is the nuchal ligament on the left side, in the middle third of the neck, halfway between the ears and the withers.

Suppliers of RFID readers and scanners should make an immediate effort to provide readers and scanners for distribution to the U.S. animal identification industry to read the ISO 11784/17785 livestock microchips, and read or at least detect all 125 kHz frequency companion animal microchips."

AND a 17th recommendation was added:
"Recommendation #17: The buyer and seller shall mutually be responsible to report any change of ownership of an equine to the appropriate equine registries and other databases recording the identification of equines."

It is important to note that microchips CURRENTLY used in the US for Equine ID are the 125kHz frequency, NOT the frequency now recommended by the ESWG.

In July of 2005 the AHC listed the new members of the ESWG on their website:
Mr. Alan Balch American Saddlebred Horse Association
Dr. Marvin Beeman, ***co-chair ESWG***, Vet & horseman, past President of AAEP, also on the Board of the AHC but is not listed as representing them.
Mr. Remi Bellocq The National H.B.P.A., Inc. (National Horsemen's Benevolence & Protective Association - racing)
Mr. Doug Burge California Thoroughbred Breeders Assn.
Ms. Cindy Chilton Palomino Horse Breeders of America
Dr. Tim Cordes USDA/APHIS/VS
Mr. Paul Estok Harness Tracks of America
J.Amelita Facchiano USDA/APHIS/VS/CEAH
Mr. Dan Fick, ***co-chair ESWG***, The Jockey Club
L. B. Fleming, DVM American Endurance Ride Conference
Mr. Alan Foreman Thoroughbred Horsemen's Associations, Inc. (deals with racing commissions for states)

Ms. Debbie Fuentes Arabian Horse Association
Dr. Pete Gibbs Texas A&M University
Dr. Mary Giddens NA/KWPN
Mr. Jim Gowen Thoroughbred Racing Protective Bureau
Dr. Nancy Halpern New Jersey Dept. of Agriculture
Dr. Steven Halstead Michigan Department of Agriculture
Mr. Neil Hammerschmidt USDA/APHIS/VS
Dr. James Heird Colorado State University
Ms. Peggy Hendershot National Thoroughbred Racing Association
Mr. James Hickey American Horse Council
Mr. Alan Hill Back Country Horsemen of America
Mr. Jeff Hooper National Cutting Horse Association
Mr. Charles Hulsey Tennessee Walking Horse Breeders' & Exhibitors' Association
Ms. Bonnie B. Jenkins U. S. Equestrian Team
Dr. Albert Kane USDA/APHIS/VS
Mr. Jim Kelley American Paint Horse Association
Dr. Maxwell Lea, Jr. Louisiana State Veterinarian
Mr. Bob Luehrman U. S. Trotting Association
Ms. Amy Mann, co-chair ESWG, American Horse Council
Mr. C. J. Marcello, Jr. Paso Fino Horse Association
Mr. Dan Metzger Thoroughbred Owners & Breeders Association
Dr. Jim Morehead American Association of Equine Practitioners
Ms. Lori Rawls U. S. Equestrian Team
Mr. Joe Santarelli Mersant International Ltd. (sponsors races, transports horses)
Ms. Cindy Schonholtz American Youth Horse Council
Dr. Billy Smith American Quarter Horse Association
Dr. Bob Stout Kentucky Department of Agriculture
Mr. Ward Stutz American Quarter Horse Association
Mr. David Switzer Kentucky Thoroughbred Association
Mr. Dan Wall National Reining Horse Association
Ms. Christine White Michigan Office of Racing Commissioner

Notice the heavy representation of the racing industry? I certainly did! My question, since this group was first formed, was *why the heavy representation of the racing industry*? The AHC's own statistics prove they are NOT the majority of the horse owners in this country. The American Horse Council's "The Economic Impact of the Equine Industry" documents an equine census of 9.2 million horses. Of these horses, 9% are used for racing, 29% for showing, 42% for recreation and 19% for other (ranching, commercial use, etc). Their rationale cannot be economic either. Their own study documents that in terms of jobs and contribution to the Gross Domestic Product (GDP), racing accounts for 26%, showing 28%, recreation 31% and other 14%. Separating out the number of jobs in the equine industry does not support this unequal representation. Racing contributes to 27% of the jobs, while showing contributes 27%, recreation 31% and other 15%. It is clear that the largest group of horse owners have essentially NO representation whatsoever.

In addition, another important segment of our society of horse owners have been totally ignored – the people who practice "plain faiths" (e.g.: the Amish). The Amish sect has members living in 20 states in the USA. Horses are a vital part of their everyday life for transportation, farming, etc. NAIS is a clear violation of their constitutional right of freedom of religion under the first amendment. The economic burden on this group would be enormous. That such a large group of individuals, for whom NAIS would threaten their very way of life, is a disgrace!

So why the heavy representation of the racing industry? Part of the answer may be found in reviewing the legislative issues the American Horse Council was involved with at the time. The advent of internet and off shore gambling was taking a toll on the horse racing industry. The AHC was lobbying hard for legislation that would protect and benefit the US racing industry.

The other part of the answer may be found in reviewing the composition of the AHC itself. *Seventy-one percent* of the AHC Board of Directors have direct ties to the racing industry. Sixty-eight, or 42%, of the organizations who are members of the AHC directly represent the racing industry.

While unfair to the rest of the horse owning public, it is easy to see why the AHC appointed such a heavy representation of the racing industry. While smaller in number in terms of ownership of horses, they invest millions of dollars into the horses they do own. Not unlike the composition of the other species working groups!

On July 25, 2005 the ESWG submitted their comments to the Federal Register during the open comment period for the NAIS Draft Strategic Plan and Draft Program Standards. Their specific comments are reproduced below as I believe it is vital that the horse owning public actually read the ESWG response (I have bolded portions of the text for emphasis):

"The ESWG supports the general principles set forth by USDA.

We would like to emphasize that a very important concern to the horse industry is the confidentiality of any data collected pursuant to a national animal ID system and the access to such data. The confidentiality, protection and safety of such data is critical to the industry and a fundamental basis for any support of a national animal ID system. Data collected should only be made available when there is a disease emergency and information on movement is necessary to trace the animals affected, or potentially affected, by a disease outbreak. ***Without confidence that any data collected is secure, and accessible only to individuals who need it under limited circumstances, the industry cannot support a national animal ID system***.

USDA sets out in the ANPR several key objectives for a national identification system. The ESWG supports each of these objectives, with the following additional comments. According to USDA, such a system should:

1. Allow producers the flexibility to use current systems or adopt new ones.

There are various forms of identification used in the horse industry now, including tattoos, brands, DNA, blood-typing, micro-chipping and others. All are valid and all must be available for use. But at some point in the future, standards may be recommended by a particular species and as animals come into the system they can be identified with then-existing technology creating a system that will evolve into a standard system naturally.

2. Be technology neutral so that existing technologies and new ones can be utilized.

3. Build upon national data standards to ensure that a uniform and compatible system evolves.

There may be some confusion regarding what USDA means by "technology neutral." We suggest that USDA specifically clarify what it means and intends by this concept. If it means that USDA will propose uniform national data standards for identification, that service providers and the industry can work toward, we can support that principle. ***But any system must allow the technology a species requires and be flexible enough so that new processes may be developed.***

4. Allow producers to be able to use it with systems that respond to market incentives.

Any national ID system should respond to the specific and individual needs of the species involved. There is no "one-size-fits-all" system.

5. Not unduly increase the role and size of the federal government.

We support the concept that the national animal ID system should not unduly increase the role and size of the federal government. ***But it seems likely that any new federal system will eventually require federal funding and additional employees.*** Since this program is intended to protect American agriculture from diseases, some potentially spread by those intending to disrupt the U.S. industry, ***federal funds will have to be appropriated for the effort.*** Since disease control is of national import and under the supervision of the federal government, the major portion of any funding should be provided by the federal government as part of the federal budget. ***While there may be some cost-sharing required, if this program proves more expensive than the benefits it provides to the horse industry that will make it even more difficult to institute.***

Specific Comments Sought

In the ANPR, USDA invites comment on questions about the NAIS:

1. When and under what circumstances should the program transition from voluntary to mandatory?

This is a very difficult question to answer at this time. With so many questions outstanding regarding the national animal ID system, it is almost speculative to predict when a program should transition from a voluntary to a mandated system. Nonetheless, making any animal ID system mandatory should only be considered after confidentiality is ensured, a consensus on the national standards formed, and technology and procedures tested, implemented and found successful. ***Making a system mandatory for any species before that species can comply with it will cause irreparable harm to this effort.***

Even when a system is in place and working, we suggest that the there be a transition period from voluntary to mandatory and that ***any requirements be phased-in for different livestock sectors as proposed by species working groups, including the ESWG***.

2. What species should be covered, both initially and in the longer term? Specifically, should the initial emphasis be on cattle or also cover other species? If so, which? Which species should be covered by the program when it is fully implemented? What priority should be given to including different species?

All species subject to USDA oversight should eventually be covered by a national animal ID system, including horses. But the initial focus should be on food animals. Because of the scope of the required system, other animals, such as horses and animals that come into contact with and can pose a disease threat to food animals, can be included in the longer-term as the system proves workable. ***The application of the system to each species should be pursuant to a timetable laid out by the various species working groups.***

The Equine Species Working Group appreciates the opportunity to provide these comments to the USDA and looks forward to working with the Department in this important effort to protect American agriculture from diseases and their effects. If you have any questions, please contact us."

The above letter is signed "Dan Fick, Marvin Beeman DVM, Amy Mann, Co-Chairs – ESWG and included a list of the members of the ESWG.

It is worth noting that 100 comments were received by the Federal Register regarding the initial NAIS documents but not ONE equine breed registry or association commented. How can this be given the mandatory deadline in these documents? Could it be because the ONLY place information was published was on the AHC website? How many members of the horse owning public are members of the AHC? How many are aware of the importance of regularly checking the Federal Register for documents that might pertain to horse ownership? How many have access to the internet? Surely the AHC was aware of these issues! In fact, I found one ONE comment from a person who solely owns and works with horses:

Comment in the Federal Register, docket ID APHIS-2005-0044, Document ID APHIS-2005-0044-0563 from Steve Kirk, Horse trainer for Volante Farms, LLC in NY:
"I firmly believe that this proposal poses an unnecessary financial burden on the owners of show and race horses which will never be introduced into the human food chain. The implantation of a micro-chip in every horse is not well thought out in respect to the costs to the owners, ***estimated by Amy Mann to be around $150***; The burden on Veterinarians for recording the details of every implantation and the associated costs to track the movements."

On August 28, 2005 the American Horse Council published a "white paper" titled "***The NAIS and Horses: Why Horses Should be Included".***
"The National Animal Identification System (NAIS) is a tool developed to ensure the health of the national livestock herds by facilitating the traceback and traceforward of animals associated with a significant disease outbreak. Often, when the topic of the NAIS is raised a familiar refrain is heard: "why are horses included? They don't carry diseases that affect humans or other livestock." This paper is intended to examine that question and determine whether its accuracy.

Although rarely experienced in the U.S., horses are in fact susceptible to numerous diseases that can also affect people. In most cases, horses do not play a role in spreading these diseases to humans. Lyme disease is an example of a disease that affects horses and humans but horses do not give Lyme disease to humans. In some cases, horses serve as sentinels for human disease surveillance. For example, West Nile Fever and Eastern and Western Equine Encephalomyelitis are diseases that frequently appear in horses before cases are seen in humans. However, horses can also contract infectious diseases that they can pass on or transmit to humans. Examples of zoonotic diseases of horses include Rabies, Salmonella, Ringworm, Leptospirosis, Brucellosis, and Anthrax.

The following is a listing of some of the zoonotic diseases that horses can share with humans and other livestock species. In addition, there are several diseases that are common to horses and to other livestock species as well as to humans, which are considered multispecies diseases."

Their statements for each disease are "bulleted". My comments are below each individual disease in *italics*:

- Anthrax - Anthrax is an acute infectious disease caused by the spore-forming bacterium Bacillus anthracis. Anthrax most commonly occurs in wild and domestic lower vertebrates (cattle, sheep, goats, horses, camels, antelopes, and other herbivores), but it can also be transmitted to humans exposed to infected animals or tissues from infected animals."

Between 1950 – 2001 there were a total of 48 cases in humans in the USA: 9 inhalational anthrax (all occupational

involving handling of goat hair). 39 cutaneous anthrax (all but 2 cases were occupational. 12 involved handling goat hair, 1 wool, rest handled carcasses of infected animals - 7 of those animals were identified as cattle, other 2 cases type of animal not specified).
In other countries humans have become infected with gastrointestinal anthrax by eating undercooked meat from infected animals. I found NO cases of horse to human spread of Anthrax.

- Borna Disease - Borna disease (BD), first described more than 200 years ago in southern Germany as a fatal neurologic disease of horses and sheep, owes its name to the town of Borna in Saxony, Germany, where a large number of horses died during an epidemic in 1885. Infection results in movement and behavioral disturbances akin to some neuropsychiatric syndromes. (Some have suggested that the virus is linked to selected neuropsychiatric disorders in humans but the evidence for this is not conclusive).

*Cases have occurred in Germany, other areas of Europe, Israel, Iran, Japan and the USA. Has also been found in cattle, rabbits, goats, deer, alpacas, cats, sloth, veri monkeys and pigmy hippoppotamus'. Neither the reservoir nor the mode of transmission of natural infection is known. *Assumed* transmission via saliva, nasal and conjunctival secretions or contaminated food and water.* ***NOT HIGHLY CONTAGIOUS!***
Has received alot of press on and off as possible cause of some mental illness but nothing scientifically proven.

- Brucellosis - On infrequent occasions, horses have been known to contract brucellosis caused by *Brucella abortus* and have, on even less frequent occasions, been a source of human infection.

There are 100 to 200 cases per year in the USA. Sheep, goats, cattle, deer, elk, pigs, dogs and several other animals listed as usual species affected. Most common cause in humans is eating/drinking contaminated milk products and slaughterhouse or meat packing plant workers handling carcasses of infected animals. Few cases via inhalation method in laboratory workers culturing the bacteria. I found not one case in a search of the infectious disease literature of a human contracting brucellosis from a horse.
From the "Summary of Notifiable Diseases --- United States, 2003", Centers for Disease Control MMWR, 52(54);1-85 April 22, 2005:
"**Brucellosis** By 2003, the National Brucellosis Eradication Program had nearly eliminated Brucella abortus infection from U.S. cattle herds. The risk of contracting brucellosis through occupational exposure to livestock in the United States or consumption of domestically produced dairy products therefore is minimal. Consumption of unpasteurized dairy products from outside the United States continues to pose a risk of infection with B. abortus or B. melitensis. The majority of U.S. cases of brucellosis occur among returned travelers or recent immigrants from areas in which Brucella species are endemic. Hunters exposed to infected wildlife might also be at increased risk for infection. Laboratory personnel working with Brucella species should follow recommended biosafety precautions. Brucella species are considered category-B biologic threat agents. "

- Encephalomyelidities (West Nile Fever, Eastern, Western) – horses **do not** play a role in transmission of these diseases to humans. The same infection occurs in horses and in humans. All three diseases occur in the U.S. However, horses do play a role in the transmission of another mosquito-borne disease, Venezuelan Equine Encephalomyelitis (VEE), to humans (see separate heading below). It should be emphasized that this disease has been exotic to the USA since the early 1970s.

See comments under VEE (listed separately toward end of listing). We already have vaccines for these diseases.

- Glanders – Glanders is one of the oldest known equine diseases that is of important biosecurity concern. It is a disease of horses, mules and donkeys. Glanders is **not** currently found in the U.S. It is a disease that can be spread from horses to humans and it was used as a biological warfare weapon by the German army in World War I. The disease continues to exist in various parts of the world, including both eastern and western hemispheres. The U.S. requires that all horses imported into the U.S., including those temporarily exported for competition purposes be tested negative for Glanders before being permitted entry (or re-entry as the case may be) .

*There have been NO cases in the USA since 1945 EXCEPT laboratory workers handling the bacteria (burkholderia mallei). It **IS** a concern as a potential agent for bioterrorism and it **IS** spread from human to human.*
Perhaps humans as well as horses should be microchipped and keep logs of their movements since humans are a far more likely target of bioterrorism using this organism!

- Hendra Virus Disease - (Acute Equine Respiratory Syndrome caused by Hendra Virus, first considered an Equine Morbillivirus) is a relatively new and emerging disease. It causes a severe respiratory illness in horses which is very frequently fatal. Humans having direct contact with blood or saliva of an infected horse are in danger of contracting the disease. Hendra Virus has only been reported in Australia, first appearing in Queensland, Australia in 1994. During the

first recorded outbreak of the disease, 14 horses died, 7 more euthanized and 3 humans became ill, one of which died. The virus was re-isolated five years later in Australia in January of 1999.

Key words - Only TWO outbreaks in 11 years with only THREE human cases - ALL in Australia. It is an emerging pathogen of which little is yet known. Reservoir thought to be flying foxes (a type of bat found in Australia).

- Japanese Encephalitis - Japanese encephalitis (JE) is a vector-borne virus capable of causing serious infection of the central nervous system (CNS) of humans. Swine are very susceptible to the infection and are also amplifiers of the virus. Less frequently, horses become infected with the disease. From an epidemiologic standpoint, people and horses are considered dead-end hosts of the virus. Under experimental conditions, however, horse-to-horse transmission has been demonstrated.

Fewer than ONE case per year in US citizens traveling to and living in Asia. There IS a vaccine available.

- Leptospirosis - Leptospirosis is a bacterial disease that affects humans and many animal species, both domestic and wildlife. Outbreaks of leptospirosis usually result from exposure to water contaminated with the urine of infected animals. Many species of animals can carry the bacterium; they may become sick but sometimes develop asymptomatic infection. Leptospira organisms have been found in cattle, pigs, horses, dogs, rodents, and in a diversity of wildlife species.
There are 100 to 200 cases in US per year but last reported "outbreak" in 1998. NO LONGER A REPORTABLE DISEASE IN US. Cause of abortion in horses. I found no evidence it is spread to humans by horses. Cattle vaccine provides only short term immunity for horses but a vaccine for horses is being developed.
If this is such a huge concern then make it a reportable disease again.

- Rabies – like other mammals, horses can be infected with rabies virus and be a source of infection for humans.

***THERE IS A VACCINE**! And, there is post-exposure treatment which **IS** effective against this disease.*
Rabies has been documented in every state but Hawaii. Make rabies vaccination MANDATORY in states where rabies is endemic if this is such a concern. An easy solution is to let each state Department of Health do the excellent job it has ALWAYS done regarding rabies.

A system of tracking animals will NOT prevent rabies and save human lives. Vaccination will. The threat of rabies stems from wild animals, therefore, if this a reason to include horses in NAIS then the USDA should be responsible for microchipping and tracking the entire wild animal population in this country.

*The December 15, 2005 article "Rabies surveillance in the United States during 2004", published in the Journal of the American Veterinary Medical Association, states: "Eight cases of rabies in human beings were reported in the United States during 2004 (Table 2).6,30-35 Two cases involved rabies infections that were acquired within the United States as a result of rabies exposures from bats, and 1 of these patients survived.34,35,a The other patient did not survive, and **because rabies was not immediately recognized as the cause of death, organs and tissues transplanted from that donor patient resulted in 4 additional rabies deaths in organ recipients**.31-33 The remaining 2 cases involved rabies infections that were acquired outside the United States in countries where canine rabies is enzootic."*
As you can see NO CASES of transmission from ANY livestock to humans!!

I have done a comparison of the years 2000, 2001 and 2004:
Cases of rabies in the year 2000: 7,369 total. 509 in domestic animals (52 horses/mules) & 6,855 in wild animals.
Cases of rabies in the year 2001: 7,437 total. 497 in domestic animals (51 horses/mules) & 6,939 in wild animals.
Cases of rabies in the year 2004: 6,844 total. 544 in domestic animals (43 horses/mules) & 6,292 in wild animals. Cats increased from 270 in 2001 to 281 in 2004, cattle increased from 82 in 2001 to 115 in 2004, sheep/goats increased from 3 in 2001 to 10 in 2004, dogs increased from 89 in 2001 to 94 in 2004. All other domestic animals experienced a decrease.

- Ringworm - Ringworm is a skin disease which can be caused by several different types of dermatophilic fungi. Numerous species of animals can transmit ringworm to people: dogs and cats, especially kittens or puppies, cows, goats, pigs, and horses can transmit ringworm to people. Humans contract ringworm through direct contact with an infected animal's skin or hair.

They neglect to mention that ringworm is commonly transmitted from human to human.
Perhaps humans as well as horses should be microchipped and keep logs of their movements if this is such a concern.

- Salmonellosis – This bacterial disease is frequently associated with poultry. However, strains of salmonella can infect horses and they constitute a zoonotic risk for humans. Furthermore, there are strains of this bacterium that exhibit resistance to multiple antibiotics. These represent a significant health risk to horses as well as to humans.

HANDWASHING eliminates contamination!
*There are an average of 40,000 human cases in the US every year - usually spread by humans not washing their hands before handling food. I found **NO** documented cases from horse to human. However, reptiles commonly harbor salmonella and show no symptoms so perhaps a Reptile Species Working Group should be started.*

- Screwworm - The scientific name for Screwworm is Chochliomyia hominivorax, which literally means "eater of man", although Screwworm infestation in humans is rare, it can, and does occur. Horses infested with Screwworm, like other livestock, could be a source of infection for humans.

There were 39 cases in US and Mexico between 1969 & 1988 - all traced to imported animals. Outbreaks prevented by introducing sterile male flies. Fatality rate 2.8% worldwide - most often poor and debilitated who die because they fail to seek medical attention. While gross, it is highly curable. Screwworm is a type of maggot from a fly not native to the US. However, we certainly DO have maggots from our own native flies. This fact they neglect to mention - probably because that would bring to light the serious problem of homeless people in this country. I cannot even guess at the number of homeless whom I have treated for maggots over the years.

- Tetanus - Tetanus is an uncommon but often fatal disease that affects the central nervous system and which causes painful muscular contractions. Tetanus bacteria gain entry to the body, usually through a wound or cut exposed to contaminated soil. Tetanus spores are widely distributed, usually in soil, dust, and manure. Horses and humans are the most susceptible of all the animal species to tetanus.

THERE IS A VACCINE!
37 cases in 2001 in US. To include this one is beyond my comprehension.
Vaccine requirements for humans in the USA are published by the Advisory Committee on Immunization Practices (ACIP), Centers for Disease Control, and followed by every physician and hospital emergency department in the USA.
Microchipping horses and tracking their movements will NOT prevent tetanus. Timely vaccination will.

- Venezuelan Equine Encephalomyelitis - VEE is a disease that is fatal to both horses and humans. In this case, horses do play a role in the transmission of the disease. The U.S. is currently free of VEE; the last outbreak occurred in 1971. At the time, the disease had spread from South America up through Central America and Mexico into Brown County, Texas, killing tens of thousands of horses and humans during that epidemic. The disease remains an ever prevailing threat in several South American countries. It is sporadically reported from Mexico, the last confirmed case in horses being reported in 1991. VEE is considered a very serious biosecurity threat because of its highly infectious nature and its significant human health impact.

THERE IS A VACCINE!
Horses play a role because their large body size allows a greater number of mosquitoes to feed off them. But the current VEE vaccine is effective against ALL strains of VEE from what I have read.
Make VEE vaccination MANDATORY if this is such a concern!
There are numerous research articles on the CDC website (of which I read all of them but the most usuable info is a 1998 book Foreign Animal Diseases "The Gray Book".

- Vesicular Stomatitis (VSV) - Another disease that is common to cattle, sheep, swine and horses as wall as humans is Vesicular Stomatitis. The clinical features of this disease in ruminant species cannot be differentiated from Foot and Mouth Disease. This requires laboratory confirmation of the virus. Direct contact with VS lesions reportedly can spread the virus from animals to humans.

Cases in horses from April 27, 2005 to April 11, 2006: 584 horses and 202 cows on 445 farms in 9 states. Cases from August 17, 2006 through December 21, 2006: 17 horses and 12 cows on a total of 13 farms in ONE state. All farms were quarantined for the duration of the outbreak.
This is a reportable disease and our system of quarantine HAS BEEN EFFECTIVE.
Vesicular Stomatitis causes a flu-like illness in humans, however, I found not a single case of human infection reported from the recent outbreaks.

It should be clear that the AHC “white paper” is little more than fear-mongering. A perfect example of looking for reasons to include horses in NAIS.

In September of 2005, Amy Mann presented the Equine Species Working Group report to the NIAA.
She listed the ESWG ID Method Recommendation
• The ISO/ANSI compatible RFID chips (11784/85, 134.2 kHz) are the recommended form of electronic equine identification in order to comply with the United States National Animal Identification System (NAIS) for the

purpose of disease control.
• Use of RFID scanners that, at a minimum read 134.2khz microchips and are able to identify the presence of a microchip in a horse. If the reader is unable to decode the chip, it must be able to identify who the manufacturer is so that the necessary reader can be obtained

There are still unanswered questions regarding tracking – which movements must be tracked and who will be responsible for reporting the information. This remains a continued focus of the ESWG.
Regarding the issue of communication, the AHC's ESWG webpage was cited as a source of information for the horse industry. How the average horse owner is supposed to know to access this site for information is not documented!

2006

In April of 2006, Amy Mann presented the Equine Species Working Group report at the NIAA annual meeting.
Ms Mann listed the following benefits of a national equine ID system for the Horse Industry:

- •Protect our horses
- •Control outbreaks of contagious foreign diseases
- •Protect human health
- •Address the threat of bio-terrorism
- •Identify lost, stolen or displaced horses
- •Maintain a stable economic environment
- •Insure freedom of movement and export of horses
- •Be a responsible member of the livestock industry

Protect human health? Have there been any outbreaks of disease in humans related to exposure to horses? Not that I could find in an extensive search of the Centers for Disease Control website and the CDC's publications "Morbidity and Mortality Weekly Review" and the "Journal of Emerging Infectious Diseases".

She lists the ESWG future focus' as:

- •Determining ID Technology Performance Standards
- •Movement Tracking
  - Questions:
    - •Which horses must be included in a tracking system?
    - •Who reports the data?
    - •Who does the data get reported to?
  - -Privatization of the Movement Recording Database

This is our first glimpse that they are struggling with the tracking issue at long last. Perhaps they did hear us after all, despite their lack of response to questions from those few of us who have actually read the NAIS documents!

She repeats the same statement regarding communication and education that has been listed since the formation of the ESWG:

- •Communication with the Equine Industry is Key!
- •ESWG Webpage operational and continuously updated
  - -www.horsecouncil.org
  - -Summary of NAIS and Equine ID, List of Benefits, FAQs, Press Releases, White Papers (Microchip Paper, Equine Health Issues and the NAIS), ESWG Recommendations, Links

While there have been a few articles in The Horse.com magazine, why, 3 years later, have there been NO articles in horse publications targeting the general horse owning public? Why have none of the major show, discipline and recreational organizations been used to help educate the horse owning public via their publications? If the American Horse Council and the Equine Species Working Group are truly "representatives of the Horse Industry", why are they having such difficulty communicating with and educating the rest of us?

Her last slide is reference to the USDA's brochures and fact sheets, which the USDA is just as guilty of not distributing. All that money spent on 4 color printed materials and one must first know to go to their website and second know how to navigate that site to find the educational materials to order! Why have these materials not been given to every Extension Service program to hand out at local programs? What a huge waste of taxpayer money!

J Amelita Facchiano, co-chair of the NIAA Equine ID subcommittee and member of the ESWG, presented an update on the electronic certificates of veterinary inspection at the same conference. It is important to note that no employment link

is listed next to her name for the NIAA Equine ID subcommittee report yet on this particular presentation she is listed as "J Amelita Facchiano, VSPS Project Team". VSPS stands for the USDA's Veterinary Services Process Streamlining. Ms Facchiano was Director of Sales and Marketing for GlobalVetLink LLC, who was awarded the USDA contract for electronic certificates of veterinary inspection. While it cannot be substantiated at this date, it would make sense that she would be "on loan" from GlobalVetLink to help with the transition into this project.

She lists the purpose of the VSPS project as:

- Collect data for animal and animal product movement events that are *under the regulatory oversight of Veterinary Services*
- Replace paper process per GPEA
  - by assuring that the necessary data for all arriving and departing livestock and animal commodities is electronically entered into a series of relational databases that interface with e-Permits projects.

She outlines how this system will integrate with NAIS:

- Ultimate goal = fully integrate VSPS with the National Animal Identification System
- Will evolve with NAIS
- VSPS eCVI will capture PINs if they exist, and send a 'sighting' report with PIN and AIN to the repository if the origin address has a PIN and animals have AINs

A PIN is the NAIS Premises ID Number, an AIN is the Animal ID Number and the repository is the tracking database. So it is quite clear that the GlobalVetLink/USDA project fully integrates with NAIS!

There are a number of other presentations at this annual meeting, under the Equine Species Working Group heading, which clearly prove that NAIS for horses is forging ahead at full speed while the horse owning public is still largely unaware!
There are some minor changes in the membership of the ESWG in 2006 but racing still predominates the representatives of the actual horse owning public. J. Amelia Facchiano is now listed as an individual, rather than a representative of a specific group, which is quite disturbing. On every list from 2002 through 2005, she is listed either as representing GlobalVetLink or the USDA's Veterinary Services. When she received the NIAA's Volunteer of the Year Award in April of 2005, she was listed as being employed by GlobalVetLink yet at the same time was listed as representing the USDA/VS on the ESWG list. That is my rationale for believing she is "on loan" to the USDA for this project.

In August of 2006, Amy Mann presented an update on the ESWG at the NIAA's Info ID Expo. The majority of her presentation is a repeat from the April meeting with this exception:

ESWG Movement Recommendation ESWG Movement Recommendation

- Rely on current regulatory mechanisms in place for horses that move.
- Brand Inspection
- Certificate of Veterinary Inspection (CVI)
- VS-127 Permit
- International Certificate of Veterinary Inspection
- Additional reporting mechanism would be heavy burden on horse owners or premises managers/owners

It appears they are backing off on the tracking recommendations, but are they? Some states require a CVI for **INTRA**state travel. Since they have previously recommended that requirements for CVI's be standardized, is this just another method to require what they recommended in the very beginning? A method that most of us in the horse owning public would not "catch"? And how nice that J Amelita Facchiano's GlobalVetLink/USDA project gets the seal of approval of the ESWG!

On November 22, 2006, the USDA published a new document titled the "National Animal Identification System: A User Guide", which states in repeated places that "NAIS is voluntary at the Federal Level". Remember those key words – "***at the Federal Level***". While they attempt to stem the rising opposition publicly, behind the scenes they provide monetary incentives in the form of grants totaling $14,454,000 directly to the states and tribes to implement this system.

Page 1 of the Cooperative Agreement states:
"Funding for FY2007 will be provided to State and Native American Tribal governments to support the continued implementation and maintenance of the national premises identification system and NAIS implementation within their respective areas. NAIS remains an industry-State-Federal partnership. In response to stakeholder input, on October 31, 2006, USDA unveiled a renewed, uniform educational message for all individuals, businesses, and organizations that focuses on the benefit of NAIS to producers. Applications for cooperative agreement funding must include an aggressive plan for education and outreach, including effective use of existing outreach resources such as cooperative extension,

State Area Veterinarian in Charge (AVIC) offices, and State industry organizations, to stakeholders at all levels within the State or Tribe."

Page 12 of the Cooperative Agreement lists what the USDA will provide funding for. Most notable is this statement:

- The Integration of existing State systems with the SPRS or a CPRS. This "pulling" of data from existing databases that already contain premises related information seems to be a prudent and cost effective method in many cases. States must carefully consider whether this type of data integration to register livestock premises under NAIS would be interpreted as "voluntary" and if this would create any problems for premises registration in the long term.

So while they caution that the "mining" of existing state databases might not be construed as "voluntary", they are still providing funds for this practice to continue!

On October 13, 2006 the Goodlatte-Boucher Bill (HR 4777 Unlawful Internet Gambling) was passed as part of the Port Security Act and became Public Law 109-347. This was a clear victory for the American Horse Council and the horse racing industry. It is of interest to note that Representative Bob Goodlatte (R-VA) was the Chairman of the House Agriculture Committee and an out-spoken proponent of NAIS.

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