

October 24, 2023

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**TO:** U.S. Department of Agriculture  
Animal and Plant Health Inspection Service 9 CFR Parts 71, 77, 78, and 86  
RIN 0579-AE64

**SUBJECT:** Docket No. APHIS-2021-0020, Use of Electronic Identification Eartags as Official  
Identification in Cattle and Bison

Thank you for the opportunity to comment on the Department of Agriculture, APHIS proposal for a national identification and traceability system using electronic eartags for cattle and bison, as outlined in Docket No. APHIS 2021-0020. The Ecosystem Service Market Consortium's (ESMC) mission is to advance ecosystem services markets that incentivize farmers and ranchers to improve soil health systems that benefit society. ESMC is a member-based not-for-profit organization operating a national scale ecosystem services market for agriculture to recognize and reward farmers and ranchers for their environmental services to society. The Ecosystem Services Market Research Consortium (ESMRC) serves as the research arm of ESMC, in which we are engaged in research, demonstration, development and deployment of tools, technologies and methodologies to improve the accuracy and rigor of greenhouse gas (GHG), carbon, water quality, water quantity and biodiversity outcomes quantification for market-based purposes.

ESMC's market financially rewards farmers and ranchers who voluntarily adjust crop and livestock production systems in ways that increase soil carbon sequestration, reduce GHG emissions, improve water quality, conserve water, and provide additional ecosystem service outcomes, such as enhanced biodiversity and habitat conservation. ESMC's program allows producers to choose which changes to undertake will be paid based on quantified outcomes.

These comments are submitted on behalf of ESMC and are not intended to represent the position of any of our individual or collective members and stakeholders.

ESMC sees potential opportunities and programmatic alignment with the proposed rule. We support the implementation of a uniform, standardized electronic identification eartag system that protects the rights and privacy of livestock producers and other private entities that comprise the beef supply chain. We also believe that:

- The system should impose no required costs for producers and specifically address potential cost barriers to operators.

- The system should be easy to access and use for all producers, and require, when appropriate, the same data inputs and outputs from all participants of each supply chain sector.
- The system should be designed to track all animals from birth to end user, allowing data transfer and exchange in each sector and process of the supply chain.
- The system should be designed to be easily updated to accommodate future technological advancements, data exchanges and other potential opportunities to increase scale, utility and effectiveness.
- The system should allow for future inclusion of data points related, but not limited, to certifying credits for ecosystem services, organic production, Beef Quality Assurance, employee wellbeing, carbon reduction and storage, and other desirable elements.

Thank you for the opportunity to provide input to USDA's APHIS rule on eartags. ESMC believes the agricultural sectors' contributions to climate change mitigation and the provision of other ecosystem services that mitigate damaging natural resource outcomes must be supported by public-private partnerships such as ours, and that we need to ensure success by equipping producers with the tools, technologies and knowledge to scale beneficial outcomes on the farm and to society. ESMC looks forward to working closely with USDA.

Sincerely,

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