



**OREGON
DEPARTMENT OF
AGRICULTURE**

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503.986.4550 | Oregon.gov/ODA

Proposed Rulemaking -

To: Lindsay Eng, Deputy Director, Oregon Department of Agriculture
Subject: Hearing Officer's Report
From: Sunny Summers
Date: October 13, 2025

Rule Summary - The purpose of this rulemaking was to allow public comment on proposed updates increase livestock brand fees.

Public Hearing – ODA held a virtual public hearing on September 30, 2025. No verbal comments were received.

SUMMARY OF COMMENTS - ODA accepted written testimony from the public through 5:00 p.m. on October 3, 2025. Written comments are attached.

Dated this 3rd day of September 2025.

A handwritten signature in black ink, appearing to read 'Sunny Summers', is written over a horizontal line.

Sunny Summers, Hearings Officer
Oregon Department of Agriculture
635 Capitol Street NE
Salem, OR 97301
sunny.summers@oda.oregon.gov
503.400.4196

Comments

Commenter	Comment	Response
Ashlea M.	<p>To Whom It May Concern,</p> <p>I am writing in opposition to the proposed increase in livestock brand fees. The initial cost of establishing a brand is already significant, designing the brand, having an iron made, and creating logos for identification and advertising. On top of that, livestock owners face rising costs for feed, veterinary care, and daily management, making it increasingly difficult to stay afloat.</p> <p>Because brand fees already require renewal every few years, increasing them now would place an unnecessary burden on livestock producers at a time of record-high expenses. I respectfully urge the Oregon Department of Agriculture not to move forward with this proposal.</p>	<p>The Oregon Department of Agriculture (ODA) acknowledges the increasing costs incurred by brand owners and producers. However, it is important to note that many of these costs also impact the brand program and its ability to continue providing livestock identification services. In response to this concern, ODA collaborated with a cross-sectional advisory committee to assess the most equitable manner to augment fees within the program, ensuring that all users are covered. This committee also recommended a pathway for the livestock identification program to achieve cost recovery for the services it provides. These recommendations were subsequently incorporated into SB1019, which was passed by the Oregon legislature in 2025.</p>
Connie D.	<p>I would say that an increase in the fees may be warranted, but to double the fees is pretty excessive. Why would the ODA wait until they are needing that much more money? Perhaps a 20% hike is sufficient for now and be looked at later to see if it's adequate. Ranchers have lots of other fee increases on the table, including auto registrations, payroll deductions, gas taxes, and other ODOT fees, if they all pass. I think ranchers don't need to get hit by two agencies this year!</p>	<p>ODA is cognizant of the escalating fees imposed by other state-funded agencies. Regrettably, inflationary pressures and increased operational costs have outpaced the fees levied by the program to ensure cost recovery. ODA has refrained from augmenting brand registration and renewal fees for an extended period, primarily relying on inspection service fees to sustain program costs. However, this approach has proven inadequate, resulting in the program operating at a substantial loss on a monthly basis.</p> <p>In response, ODA collaborated with a cross-sectional advisory committee to assess the most equitable method of increasing program fees for all users and establish a pathway for the livestock identification program to</p>



		<p>achieve cost recovery for the services it provides. The proposed solution involved raising brand registration and renewal fees for a four-year period during which they are renewed. This approach would ensure that only a quarter of brand holders would be subject to renewal fees in 2026, with the remaining holders being phased in over time. The recommendations of this committee were subsequently incorporated into Senate Bill 1019, which was enacted by the Oregon legislature in 2025.</p>
Neva H.	<p>I do not believe the brand fees need to be increased at this time. Just because beef prices are for once allowing cattlemen to break even, or make a few dollars, that doesn't mean OFA needs to once allowing cattlemen to break even, or make a few dollars, that doesn't mean OFA needs to increase brand fees!</p>	<p>ODA acknowledges the increasing costs incurred by brand owners and producers. However, it is important to note that many of these costs also impact the brand program and its ability to continue providing livestock identification services. In response to this concern, ODA collaborated with a cross-sectional advisory committee to assess the most equitable manner to augment fees within the program, ensuring that all users are covered. This committee also recommended a pathway for the livestock identification program to achieve cost recovery for the services it provides. These recommendations were subsequently incorporated into SB1019, which was passed by the Oregon legislature in 2025.</p>
Michelle S.	<p>To whom it may concern:</p> <p>My family has a long history of raising cattle in Oregon, as well as my husband's family, both dating back to the stagecoach and settlers era. In the last ten years, there has been more bureaucratic rules imposed on cattle producers than in the last 100 years. Fees have gone up as well in the last 10 years. The increases in fees wouldn't be an issue, however it is being</p>	<p>ODA acknowledges the increasing costs incurred by brand owners and producers. However, it is important to note that many of these costs also impact the brand program and its ability to continue providing livestock identification services. In response to this concern, ODA collaborated with a cross-sectional advisory committee to</p>



	<p>mismanaged by the state. Anytime a cattle producer looks into getting a new brand, a lady in the office denies it without any knowledge of how brands are handled. For example, trying to re-register a family brand, that is similar to brands already in place, it gets denied automatically, then the consumer has to reapply and explain that it is a family ranch and the brands are similar to identify each person's cattle separately, but remain identifiable as a ranch in whole. The lady also does not approve simple brands, they have to be complicated and end up blotching. This back and forth with a person who has never had cattle and does not understand the struggles of the industry, costs the tax payers money. To save money for the state of Oregon, one person from the city that works in an office, shouldn't have say in approving brands, the brand inspectors that work with the cattle ranchers day in and day out should be the ones who approve new brands, because they are the ones who see the brands every day and work with the cattlemen.</p> <p>Cattle producers pay brand inspection fees to ship cattle, we then pay a brand fee at the sale barn as well. Cattle prices may be high right now, but when they drop back to .85 per pound, and we have to pay \$200 a ton hay no small business cattle producers can afford to even have the cows, let alone pay all of the fees associated with raising them.</p> <p>If all of the little cattle producers get put out of business, and only the big guys are left, beef prices in the store will skyrocket because supply will not keep up with demand. Simply put if the funds are currently being mismanaged by office personnel right now, and you raise brand fees to keep office personnel employed, you may cause a backlash in the beef industry when small producers cannot afford to keep up with expensive brand fees. Make cuts in your head office to stay within the budget you already have.</p>	<p>assess the most equitable manner to augment fees within the program, ensuring that all users are covered. This committee also recommended a pathway for the livestock identification program to achieve cost recovery for the services it provides. These recommendations were subsequently incorporated into SB1019, which was passed by the Oregon legislature in 2025.</p> <p>Furthermore, the livestock identification program is undergoing a series of modifications concurrently to mitigate increased costs and optimize efficiency, thereby minimizing expenses. ODA intends to establish a brands advisory committee, comprising representatives from all industries with an interest in brands and the brands program. This committee will provide counsel to the Department on policies pertaining to brand conflicts, the financial health of the program, and the feasibility of self-inspection pilot programs. These matters will be addressed during a subsequent rulemaking process later this winter.</p>
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Lawrence M.	<p>Suggestion to consider in your proposed changes; There is an increasing number of former cattle centered families in Oregon that are no longer actively involved in an operation that requires the branding of their livestock. There are a number of reasons for this, one of them being the loss of open range, which had a huge impact on my family. A decreasing interest among our diverse family members has also led many members into other industries. In the meantime the ranch has survived by branching out into other pursuits. However, a strong 'bond' in the family is the livestock brand which in past times identified our family and to this day is still very important to its very diverse members. Each year, for the past 90 some years, in the month of June a JL Family Reunion takes place on the JL Ranch in southern Oregon; The Martin Family Burial Ground on the JL Ranch still receives JL family members; Family Members identify their generation. and their position within that generation by a unique system that starts with JL-1.</p> <p>In short, the JL livestock brand is very entwined in a large, diverse, Oregon, former cattle centered, family. I'm quite sure this is not an uncommon story.</p> <p>Consider creating a 'Legacy' category for Oregon brands, such as ours that are not in active use today, protected by registration, but 'on hold' for a future family member, who has a desire to enter the livestock market and reactivate the brand of his early family. A modest fee for placement into this category; a reactivation fee and a resumption of yearly fees could resume upon active use of the registered brand.</p> <p>Thanks a million for the opportunity to be involved.</p>	<p>The Oregon Department of Agriculture (ODA) acknowledges the suggestion of establishing a “legacy” brand category to accommodate the numerous generations of cattle families in Oregon who desire to preserve their family brand. This concept has been implemented by other neighboring states and has been considered by brand program staff. In the upcoming months, ODA intends to establish a brands advisory committee, which will consist of representatives from various industries with an interest in brands and the brands program. This matter will be presented to the brands advisory committee for their consideration, along with any potential conflicts with these legacy brands and new brand activations that may restrict the availability of new brands within the state.</p>
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