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To: Lindsay Eng, Deputy Director, Oregon Department of Agriculture
Subject: Summary Report on Public Comment
From: Sunny Summers
Date: September 22, 2026

Rulemaking Public Comment Summary - The purpose of this rulemaking public comment period was to allow public comment on rules updating the livestock ID program (brands).

Public Hearing – ODA held a public hearing on July 16, 2026. No public comments were received during the hearing.

Summary of Written Comments - ODA accepted written testimony from the public through 5:00 p.m. on August 31, 2026. Three written comments were received. Those comments can be found on the following page.

Dated this 22nd day of September 2026.

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
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Comments

Commenter	Comment	Response
Gordon C.	We have been using EID ear tags, regular ear tags with our ranch name, our brand, and metal bangs type tags. Over 7 years all our mother cows have used EID tags and they work very, very well. Our EID tags have our International identification number.. We have found the EID tags are very secure and rarely fail. Our ranch is 52,500 acres deeded and cattle exclusively. Canada and as small of country as Uruguay EID tags are mandatory. They could export where we could not. Thanks	Thank you for your comments.
Morgan K. (Pres., OR CattleWomen)	Dear Oregon Department of Agriculture, On behalf of Oregon CattleWomen (OCW), thank you for the opportunity to provide comments regarding the proposed updates to Oregon's Livestock Identification Program rules. Oregon CattleWomen represents women involved in and supportive of Oregon's cattle industry, including ranchers, producers, agricultural professionals, and families whose livelihoods and communities are closely connected to livestock production. While OCW does not serve in the same direct industry-representation capacity as organizations such as the Oregon Cattlemen's	Thank you for your comments.



	Association, our members have a strong interest in ensuring Oregon maintains a livestock identification system that is practical, effective, and responsive to the people who rely upon it. Brands remain an important tool for livestock identification, proof of ownership, theft prevention, and commerce throughout Oregon. For that reason, we believe decisions regarding administration of the Livestock Identification Program should continue to be informed by people with practical, firsthand knowledge of livestock production and the use of brands. OCW supports maintaining meaningful producer and livestock-industry representation on the Livestock Identification Program Advisory Committee. Oregon’s livestock industry is diverse, and the committee should include individuals who understand how the brand program functions in real-world livestock operations and how changes to the program may affect producers throughout the state. We also support a clear, consistent, and transparent process for reviewing new brand applications and resolving potential brand conflicts. Producers need confidence that brand decisions are made using understandable standards, applied consistently, and informed by individuals familiar with how brands actually appear and function on livestock. An advisory committee with appropriate livestock expertise can provide valuable perspective to the Department when questions or conflicts arise. Additionally, we encourage ODA to administer the program in a manner that remains cost-conscious and accessible to Oregon livestock owners. Regulatory changes should strengthen the	
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	integrity and long-term functionality of the brand program without creating unnecessary complexity or burdens for the producers who depend upon it. Oregon CattleWomen appreciates ODA's willingness to receive input from Oregon's livestock community during this rulemaking process. We encourage the Department to give careful consideration to the recommendations submitted by organizations directly representing Oregon livestock producers and to ensure that producer experience remains an integral part of the Livestock Identification Program moving forward. Thank you for your consideration and for your continued work on behalf of Oregon agriculture	
Diana W. (Pres., OR Cattlemen's Assoc.)	Dear Oregon Department of Agriculture, On behalf of the Oregon Cattlemen's Association (OCA), we respectfully submit the following comments regarding the proposed updates to the Livestock Identification Program (Brands) Rules currently open for public comment. We appreciate the opportunity to provide input on rules that directly affect Oregon's livestock producers, brand holders, and the integrity of the Livestock Identification Program. Below are OCA's comments and recommended revisions to the proposed rule language: 603-014-0049 - Livestock Identification Program Advisory Committee (1) We recommend clarifying the role of the advisory committee as follows: • The Director will establish an advisory committee for the Livestock Identification Program. The Committee's primary role is to advise the Director on matters relating to the administration of the	Thank you for your comments. Regarding the purpose and function of the Livestock Identification Program Advisory Committee, ODA heard overwhelmingly from our Rules Advisory Committee (RAC) members and industry representatives that this group should advise on the brand program holistically, not just for brand conflict resolution.



	Livestock Identification Program and may make recommendations concerning the inspection and certification services rendered by the Department. • This Committee will review and make recommendations regarding conflicts for new brand applications. (2) We support the following committee composition with amendments, to ensure balanced representation across Oregon’s livestock sectors: • (a) One (1) designee of the Oregon Cattlemen’s Association • (b) Three (3) cow-calf producers, who may be members of OCA • (c) One (1) designee of the Oregon Dairy Farmers Association • (d) One (1) dairy producer, who may be a member of ODA • (e) One (1) feedlot industry member • (f) One (1) Tribal liaison • (g) One (1) auction yard representative • (h) One (1) slaughter facility representative • (i) One (1) member of the Board of Agriculture with knowledge of the livestock industry (3) We support the proposed three-year terms, with staggered initial appointments to ensure continuity. Vacancies should be filled for the remainder of the unexpired term. (4) We recommend maintaining the requirement that the Committee meet at least annually, with additional meetings scheduled as needed to resolve brand conflicts. (5) We support reimbursement for actual and necessary expenses incurred in the performance of	Additionally, having this group review every new brand registration request with this committee would be burdensome, costly and would create unnecessary delays. The easing of brand conflict restrictions in policy that is reflected in this rule should eliminate the need for committee review of most brand applications. Lastly, ODA specified representative seats on the advisory committee from both Oregon Cattlemen’s Association and Oregon Dairy Farmer’s Association by request of those associations. The additional producers on the advisory committee are intended to represent a diverse cross-section of the industry that is
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	official duties, consistent with DAS travel policies. Committee members should not receive compensation for service. 603-014-0035 – Conflict Check; Adjustment of Conflicting Brands OCA supports the following clarifications to ensure consistency, transparency, and fairness in the brand conflict review process: (1) The Department will review new brand applications for conflicts with existing brands. Should the Department deem it necessary to adjust conflicting brands, such adjustments will be made on the basis of priority of continuous record; however, owners of conflicting brands may make mutually agreeable adjustments subject to Department and Brand Advisory Committee approval. (2) After review, a brand will be recorded if the requested design: • (a) Is not already recorded in the same location on the same species of livestock • (b) Has at least one distinguishing difference from a recorded brand • (c) Does not contain a character on the Oregon Brand Conflict List that would create a conflict • (d) Is not likely to result in blotching and is easily distinguishable from another brand on an animal • (e) Is not in violation of any other requirements of this chapter or ORS Chapter 604 (3) The Department shall use the Livestock Brand Advisory Committee to review brand conflicts and provide advice. Thank you for the opportunity to comment on these proposed rule updates. OCA remains	impacted by the brand program and do not want to condition or assign any organizational affinity to those positions in order to maintain equity across producers.
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	committed to supporting a modern, cost efficient, and producer-focused Livestock Identification Program that protects and strengthens Oregon’s livestock industry. We look forward to continued collaboration with ODA as these rules move toward adoption.	
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