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October 9, 2001

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FEDERAL REGISTER

FSIS Docket Clerk
U. S Department of Agriculture
Food Safety and Inspection Service
Room 102, 300 12th Street, S.W.
Washington, DC 20250-3700

Re: Docket Number 00-036A

Dear Sir or Madam:

This letter responds to the advance notice of proposed rulemaking (ANPR) published in the August 7, 2001, *Federal Register*. In the ANPR the Food Safety and Inspection Service (FSIS) invited comments on the need for regulations clarifying the definitions of "United States cattle" and "United States fresh beef products" for labeling purposes.

The National Turkey Federation (NTF) appreciates the opportunity to submit comments in response to this ANPR. NTF is the only national trade association exclusively representing all segments of the turkey industry, including growers, processors, breeders, hatchery owners and allied industry. NTF's membership accounts for more than 95 percent of all turkey production and processing in the United States.

Consistent with the turkey industry's long-standing policy of opposing country-of-origin labeling, NTF opposes change in current origin labeling requirements for beef (or other meats and poultry).

The ANPR was issued in response to a mandate included in the *Conference Report* accompanying the 2000 Agriculture Appropriations Bill, but there is no convincing evidence that there is a real problem that needs to be addressed by additional federal regulation. Further, any new mandatory labeling rules established for beef could easily be broadly applied to all livestock and poultry. This is a very real possibility in view of efforts by beef interests to revise poultry regulations in the name of "equity."

Turkey exports have grown to about 450 million pounds annually and represented about nine percent of total production in 2000. Changes in labeling requirements could undermine U.S. efforts in international negotiations focusing on establishing uniform global rules of origin and lead to disruptions in the global trade of meat, which could be very costly to domestic turkey producers and processors and provide no benefit to



consumers. In addition, we are concerned about retaliatory actions of turkey importers who oppose U.S. actions to implement this non-tariff trade barrier.

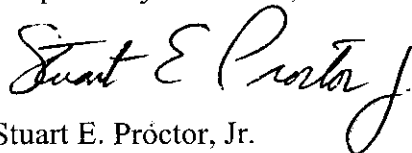
FSIS regulations already “permit fresh beef products to be labeled with terms such as ‘U.S. (Species),’ ‘U.S.A. Beef,’ and ‘Fresh American Beef.’” (9CFR 317.8) Further, as the ANPR points out, “FSIS interprets these terms to mean that the cattle to which the terms are applied were born, raised, slaughtered and prepared in the United States or in specific geographic locations in the United States.” We believe current FSIS interpretation of these selected origin marks is logical and proper, as well as “truthful, accurate and not misleading.” In a voluntary program that would require Agricultural Marketing Service (AMS) monitoring and certification, a label such as “U.S. Beef: produced from cattle born and raised in the U.S.” would be appropriate. Beef that is not produced under the AMS-administered voluntary program, but obtained from cattle slaughtered under U.S. federal inspection, should continue to be marked “Product of the U.S.A.”

Applying the current definition for “U.S.A. Beef” and “Fresh American Beef” more broadly to additional country-of-origin labels, such as “Product of the U.S.A.” is not necessary and would be disruptive. NTF believes that substantiation and verification of “born, raised, slaughtered and prepared in the United States” would be unreliable and expensive since there is no national tracking system for cattle in the United States. We recommend all discussion of this issue cease until the beef industry has implemented a mandatory national trace-back program.

In summary, present FSIS policy with regard to identifying the origin of beef (or other meat or poultry products) is proper and appropriate.

NTF appreciates this opportunity to comment.

Respectfully submitted,

A handwritten signature in black ink that reads "Stuart E. Proctor, Jr." The signature is written in a cursive style with a large, prominent 'S' and 'P'.

Stuart E. Proctor, Jr.
President
National Turkey Federation