



MEAT IMPORTERS COUNCIL OF AMERICA, INC.

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FSIS Docket Clerk
Docket #00-036A
Department of Agriculture
Food Safety Inspection Service
Room 102 Cotton Annex Building
300 12th Street, SW
Washington, D.C. 20250-70

1012

Re: Proposed Rulemaking, Product Labeling: Defining "U.S. Cattle" and "U.S. Fresh Beef Products"

This statement is filed on behalf of the Meat Importers Council of America, Inc. ("MICA") pursuant to the invitation for comments published in the Federal Register concerning *Proposed Rulemaking, Product Labeling: Defining "U.S. Cattle" and "U.S. Fresh Beef Products"*, (Fed. Reg. Doc. 01-19749, Aug. 7, 2001). The notice requested comments on the need for regulations to clarify the definition of "United States cattle" and "United States fresh beef products" for labeling purposes.

MICA is an incorporated trade association which represents the U.S. industry that imports fresh, chilled and frozen beef into the United States. MICA's regular members are importers who account for most of the non-NAFTA imports of this product. MICA's membership also includes organizations such as port authorities, refrigerated warehouses, customhouse brokers, etc. who provide services in connection with this imported product, as well as users of the same.

MICA has no objection to the proposed rulemaking for the "*voluntary*" labeling of "*Beef: Made in the USA*" as beef products that originate from cattle that are raised, fed a minimum of 100 days, and are processed in the United States. The emphasis of MICA's support is that this be a "*voluntary*" program and that it is not associated with efforts to impose country of origin labeling on any beef and beef products. MICA has no view on whether alternative terminology such as; "U.S. Cattle"; "U.S. Fresh Beef Products"; "USA Beef" or "Fresh American Beef", better convey that the products meet the proposed definition but MICA is strongly opposed to the introduction of mandatory country of origin labeling.

MICA also supports the continued use of "*Product of the U.S.A.*" to identify products that have been prepared in the United States. Consistent with the international definition of this terminology, it does not require that the product be derived only from animals born, raised, slaughtered and prepared in the United States. As noted in the request for comments, this term has been used on livestock products derived from cattle that originated in other countries and also for products derived from cattle slaughtered in other countries when those products have been further prepared in the United States. To make any change to the definition of this term would be inconsistent with international practice and create serious logistical and labeling issues when product from a variety of countries is mixed to produce the end product.

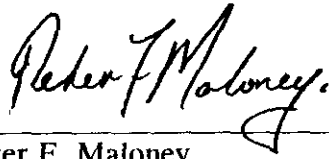
It would also raise potential issues regarding the certification of the product. Any meat product prepared in the United States requires certification by the FSIS. In order to so certify, the FSIS must accept the veracity of the initial certification of all of the products that have been used as inputs in the preparation of the end product. Consequently the purchasers and users of this product are accepting the assurance of the US agency, namely FSIS, that the end products are wholesome. This assurance is reflected in the label "*Product of the USA*" in addition to the US inspection stamp.

In summary MICA has no objection to the proposed rulemaking as proposed in the advance notice.

Respectfully submitted,

MEAT IMPORTERS COUNCIL of AMERICA, INC.

BY

A handwritten signature in cursive script that reads "Peter F. Maloney". The signature is written in black ink and is positioned above a horizontal line.

Peter F. Maloney
Chairman