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Frank Keating
Governor

Mary Fallin
Lt. Governor

STATE OF OKLAHOMA
DEPARTMENT OF AGRICULTURE

Dennis V. Howard
Commissioner and Secretary

H. Lynn Davis
Assistant Commissioner

October 4, 2001

1015

FSIS Docket Clerk
Docket #00-036A
U.S. Department of Agriculture
Food Safety and Inspection Service
Room 102 Cotton Annex Building
300 12th St. SW
Washington, DC 20250-3700

To Whom It May Concern:

We are writing as beef producers and as representatives of the Oklahoma Department of Agriculture, the lead agency responsible for protecting animal and human health in terms of food production and inspection. We strongly oppose the petition submitted in September 2000 that would allow imported cattle to be fed in this country for 100 days to be labeled, "Beef: Made In The USA."

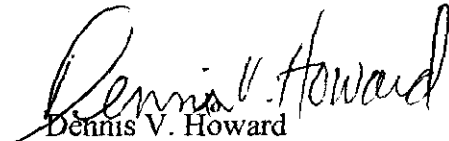
This is worse than misleading. It is potentially dangerous to human health, consumer confidence and the United States' cattle industry. Infectious and insidious diseases—whether endemic or not to this country—could cross our borders at any time. We are most concerned with the possibility of cattle of foreign origin that might carry BSE and enter our food supply.


Our NAFTA trading partners do not have an effective tracking mechanism or inspection service to monitor and control potentially infected livestock. For instance, the risk of cattle moving into Mexico from a third country and then finding their way across the border into the U.S. is not only very real, it is happening today. Cattle of Australian origin were shipped into Mexico in 1999 and then "lost." The Mexican government was able to identify a few of these cattle but many others were never accounted for. Nicaraguan cattle have also been imported into Mexico recently. The Nicaraguan government has made additional requests to send even more of their cattle to Mexico for grazing and feeding.


If cattle are to be allowed into this country for feeding, processing and U.S. consumption, rules should be implemented for testing for a variety of diseases including but not limited to: Tuberculosis, Paratuberculosis (Johne's Disease), Anthrax, Scabies, Screw Worms, Bovine Piropiasmosis, Malignant Catarrhal Fever and all Vesicular diseases. **In addition, all cattle slaughtered that were not born in this country should be tested for BSE, heavy metals, and antibiotics and pesticides unauthorized by USDA or the FDA prior to being offered for sale.**

Consumers have a high degree of confidence in the safety of foods produced and processed in the U.S. When they purchase a product labeled as "Made In The USA," it should be a truly American product. We firmly believe in a country of origin labeling law for all food products and fully support the policy statement adopted by NASDA last year supporting this law. However, we understand political pressures have prevented this step for the time being. Since the proposal currently being considered will only apply to U.S. beef products, it is imperative that all items so labeled consist only of non-foreign supplies.

Sincerely,


Dennis V. Howard
Commissioner of Agriculture


Dr. Burke Healey
State Veterinarian


Dr. Bill Barnum
Food Safety Director

cc: Ann M. Veneman, USDA Secretary of Agriculture