

October 3, 2001  
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To Whom It May Concern:

As producers and consumers, we are writing in response to the proposed rulemaking regarding the definition and labeling of U. S. cattle and beef.

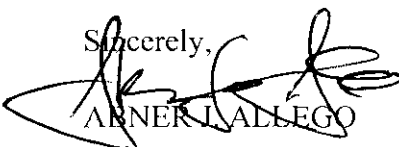
We strongly support the definition of cattle and beef products for labeling purposes as “born, raised, slaughtered, and processed in the United States.” All other definitions are inaccurate and inappropriate. U. S. producers spend significant time, money, resources and energy in order to produce top quality livestock. Allowing cattle that were born and partially raised in another country to qualify for a label that signifies that it is a product of the U.S. would be VERY offensive to U.S. producers, not to mention misleading to consumers. We, therefore, oppose the petition submitted in September 2000 that would allow imported beef products to be fed in the U. S. for 100 days, processed in the U.S. and receive a country-of-origin label, “Beef: Made in the U.S.A.” That would be a false label and a lie to the consumer.

Currently, various labeling terminology can be used to convey that the product is a product of the U.S., including labels such as: “U.S. Fresh Beef Products,” “U.S.A. Beef,” “Fresh American Beef,” and “Beef: Product U.S.A. Beef,” and “Beef, Product of the U.S.A.” We maintain that for all such labeling terminology the definition of (American) beef requires that the beef products are from cattle that are born, raised, slaughtered and processed in the U. S. A. Moreover, establishing and using this definition for all labeling terminology eliminates confusion and ambiguity, particularly for consumers who may not be aware that different labeling terminology could have different definitions. Likewise, a further step to help eliminate confusion would be for USDA to authorize a single terminology – rather than the current range of terminology.

As producers, we believe it is critical that the definition of beef is truthful and accurate. Labeling can be a valuable marketing tool to help promote products and to allow us to better compete in the marketplace. Our nation has an international reputation for growing and producing high quality beef. A definition other than born, raised, slaughtered, and processed in the U.S.A., diminishes the integrity of the U.S. livestock industry.

We strongly support a mandatory program with a uniform, consistent definition for domestic origin as born, raised, slaughtered and processed in the U.S. Legislation such as S.280 and H.R. 1121 would require such a system. It is our hope that FSIS will implement meaningful labeling regulations for cattle and beef products.

Sincerely,



ABNER J. ALLEGO