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

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Leonard D. Suxton

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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 it is a product of the U.S. would be 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 United States and received a country of origin label, ""Beef: Made in the U.S.A.""

Currently, various labeling terminology can be used to convey that the product is a product of the United States, including labels such as, "U.S. Fresh Beef Products," "U.S.A. Beef," "Fresh American Beef" and "Beef: Product of the U.S.A." We maintain that for all such labeling terminology the definition of beef requires that beef products are from cattle that are born, raised, slaughtered and processed in the U.S. 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 that 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, diminishes the integrity of the U. S. Livestock industry.

Additionally, while we write with producer interests at stake, we are also consumers. We buy toys, clothes, cars and many other manufactured goods that bear the country of origin label; and yet, there is no requirement for country of origin labels for the food we feed to our families. As a matter of choice, many consumers may wish to purchase meat from animals born and raised in the United States.

There are labeling practices in certain government programs that could serve as models to establish a verification program. Currently slaughter plants operate segregation plans for various certification programs, such as for breed claims like Angus beef. Domestic origin requirements for federal feeding programs such as for the National School Lunch Program must also be met. These certification programs result in label claims that follow the product through distribution to the retail level beginning with the live animal.

Finally, we strongly support a mandatory program with a uniform, consistent definition for domestic origin as born, raised, slaughtered and processed in the United States. 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,

Leonard D Suxton