



**NATIONAL
FARMERS
UNION**

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

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00-036A 00-036A-6 Leland Swenson
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On behalf of the family farm and ranch members of the National Farmers Union (NFU), I am writing in response to the proposed rulemaking regarding the definition and labeling of "United States cattle" and "United States fresh beef products." (Docket #00-036A).

The NFU is a general farm organization with nearly 300,000 members throughout the United States. Our organization is a federation, with the presidents of the 24 state and regional Farmers Union organizations serving as its board of directors. NFU's policies are rooted in our commitment to sustain and strengthen family farm and ranch agriculture and rural communities.

The NFU strongly supports the Food Safety Inspection Service's (FSIS) current definition for voluntary labeling of fresh beef products as meaning that products are derived from cattle born, raised, slaughtered and processed in the United States or in a specific geographic location in the United States.¹ NFU maintains that any variation from this definition, such as allowing cattle to be born and raised in another country and processed in the United States, is misleading to consumers and harms the integrity of our domestic livestock producers.

Furthermore, the definition of "born, raised, slaughtered and processed in the U.S." should apply to *all* labels for beef that signify beef as a U.S. product. This includes labels (or similar labels) such as "U.S.A. Beef," or "Fresh American Beef," but likewise for labels such as "Product of the U.S.A." or "Beef: Made in the U.S.A." Establishing and using this definition for all labeling terminology eliminates confusion and ambiguity for consumers, producers and industry alike.

According to the Federal Meat Inspection Act (FMIA)² the Food Safety Inspection Service (FSIS) issues regulations to ensure that labeling statements bearing the products' origins are truthful, accurate and not misleading. The definition of beef products' origin defined as "from cattle born, raised, slaughtered and processed in the U.S." appropriately reflects the intent of the Act. This labeling terminology precisely and straightforwardly conveys the definition of cattle and fresh beef products that should qualify as products of the U.S.

¹ Food Safety and Inspection Service, *Product Labeling: Defining "U.S. Cattle" and "U.S. Fresh Beef Products*, Background, August 2001.

² U.S.C. 601 et seq.

There are labeling practices in place that could serve as full or partial models for verification programs. Currently slaughter plants operate segregation plans for various certification programs (i.e. for breed claims such as Angus beef) and to meet domestic origin requirements of federal feeding programs (i.e. National School Lunch Program). These certification programs result in label claims that follow the product through distribution to the retail level beginning with the live animal.³ Additionally, some livestock producers are required by their packers to sign an affidavit acknowledging that they have not fed ruminant products to their cattle.⁴ Similar certified documents, such as affidavits, could be used to document the origination of beef as part of a verification program.

Producers and consumers overwhelmingly support country of origin labeling. According to a 1999 Wirthlin Worldwide survey, 86 percent of consumers agreed with the statement that the United States should require labels on meat that show country of origin.⁵ However, the current and inconsistent labeling rules for domestic origin products prevent consumers from making an informed choice between U.S. and imported products. Unfortunately, too many consumers are misled to believe the unmarked meat products they purchase in grocery stores are from the United States. Consumers are also misled into thinking that the presence of a USDA grade means the product originated from U.S. born and raised livestock.

America's livestock producers are proud of their record for producing quality meat and meat food products from American raised livestock. They invest tremendous resources into raising livestock. It is their hope, that the labeling terminology used to signify beef as a U.S. product – be it “Beef: Made in the U.S.A.,” “Fresh American Beef,” et. al – is derived from the definition, “born, raised, slaughtered and processed in the United States.

NFU appreciates the opportunity to offer its views concerning this matter and looks forward to working with FSIS to achieve meaningful definitions for beef labeling requirements.

Sincerely,



Leland Swenson

³ Food Safety Inspection Service report: *Mandatory Country of Origin Labeling of Imported Fresh Muscle Cuts of Beef and Lamb*, January 2000, page 11.

⁴ IBP News Release: *Feeding Certification Program Planned*, February 8, 2001.

⁵ Food Safety Inspection Service report, page 26.