

# MICHIGAN FARM BUREAU

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October 10, 2001

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

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Dear Sir or Madam:

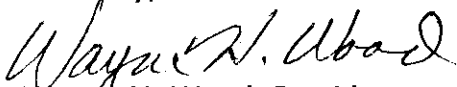
The Michigan Farm Bureau appreciates the opportunity to provide comments on the Advanced Notice of Proposed Rulemaking to clarify the definition of "United States Cattle" and "United States fresh beef products" for labeling purposes. Farm Bureau supports a definition of "Beef: Made in the USA" stating that beef products must originate from cattle that are raised and fed a minimum of 100 days and processed without leaving the United States.

Farm Bureau has participated in a working group for nearly two years with retail and packer industries to develop a program that would label U.S. beef products. This coalition sent a petition to USDA on September 8, 2000, requesting that the Agricultural Marketing Service promulgate rules to create a voluntary certification program to create a USDA process to certify "Beef: Made in the USA." We met in July with Undersecretary Bill Hawks in an effort to move forward with the rulemaking of this program.

We recommended that to qualify for this program, beef products must originate from cattle that are raised and fed a minimum of 100 days and processed without leaving the United States. Beef producers and processors who want to make process verification marketing claims under the "Beef: Made in the USA" program must develop a written certification system that requires cattle feeders, beef packers and retailers to maintain adequate systems and records to qualify for this voluntary program.

Broadening the definition of U.S. beef to allow cattle raised and fed for 100 days to be eligible for the U.S. beef labeling stamp would allow the vast majority of beef cattle producers to participate in the program. We believe that this type of clear labeling of U.S. beef product does not violate any international trade laws and believe that a process verified program administered by the Agricultural Marketing Service would allow for truthful and accurate labeling statements.

Sincerely,

  
Wayne H. Wood, President  
Michigan Farm Bureau