RED ANGUS
ASSOCIATION OF AMERICA

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Chief, Standardization Branch
AMS Livestock and Seed Program
USDA Stop 0254
1400 Independence Ave., SW
Washington, D.C. 20250-0254

RE: Docket No. LS-02-02, Breed Claims

The Red Angus Association of America is strongly opposed to the Breed Claims portion of this document. As written, it continues to allow Breed Associations to make factually inaccurate and unverifiable claims (including those conveyed by brand names, logos, point of sale, etc.) using phenotypic live animal specifications that are misleading to consumers. By taking the position that breed claim requirements for USDA-AMS recognized Breed Associations are outside the scope of USDA scrutiny, the USDA is abrogating its responsibility to the industry and to the consumer.

Currently there are breed claims made for only two breeds, Angus and Hereford, with 24 Angus and three Hereford product lines (Appendix 1). All 27 products use phenotypic describers for live entry into their programs.

The Angus programs all work from Schedule GLA (Appendix 2) in which cattle can qualify through Method 1 – genotype (genetically) or Method 2 – phenotype (looks) with five programs accepting cattle from either method and 19 exclusively from Method 2, phenotype. The criteria for phenotype is, "Cattle eligible for certification in Angus influence beef programs based on phenotype (appearance) must be predominately (51 percent) solid black." However, this criteria is not unique to Angus with purebred cattle from the following 20 breeds in addition to Angus able to satisfy these requirements:

Beefalo	Holstein[1]
Beef Fresian	Limousin
Belted Galloway	Maine Anjou
Brangus	Pinzgauer
Braunvieh	Saler
Chianina	Senepol
Corriente	Simbrah
Galloway	Simmental
Gelbvieh	South Devon
Hays Converter	Texas Longhorn

[1]GLA states that carcasses from certified animals with dairy characteristics shall be excluded via carcass specifications. This would remove some but not all qualifying carcasses from Holsteins.

Advertising by the American Angus Association and regional Angus associations confirm that black-hided phenotypic indicators do not work. This is demonstrated by American Angus Association's 1996 national advertisement. This advertisement featured three black bulls only one of which is Angus (Appendix 3). The text starts:

> "The registered Angus bull will earn the most.
> But which one is he? Even the owner of these three bulls, registered by three different breeds associations, isn't sure he can tell by looking. That's the problem when buying bulls..."

And concludes:

> "Which bull is the Angus? You need his performance pedigree to know for sure. Looks won't always tell you."

A more recent advertisement (Appendix 4) placed by the North Carolina Angus Association, Inc. in the N.C. Cattlemen's Beef Council's 2003 Calendar features the same three bulls with the headline:

> "ALL black bulls are not created ANGUS!"

Because of the large number of breeds carrying the black gene, the palatability of beef (given equal quality grade) would not be expected to be different whether produced from cattle that met the 51% black hide requirement or those that did not. Therefore, qualifying carcasses would not differ from commodity beef of an equivalent grade. This is supported by a number of the most respected beef industry scientists (Appendix 5).

Additionally, the phenotype method in Schedule GLA states that cattle can be "either horned or polled." The Angus breed is polled[2,3] (genetically without horns), and the polled gene is dominant to the recessive horned gene. This means that all progeny of Angus will be naturally polled, thus neither parent (sire or dam) of an animal that is horned or has been dehorned after birth can be an Angus[4,5]. In other words, a horned or dehorned animal cannot be the progeny of an Angus.

[2]A History of the Angus Breed. 1973. Pp. 1-11. American Angus Assoc., St. Joseph, MO.

[3]Purdy, H.R. and R.J. Dawes. 1987. Breeds of Cattle. Pp. 19-21. Chanticleer Press, Inc., NY.

[4]Rice, V.A. 1926. Breeding and Improvement of Farm Animals. Pp. 328-331. McGraw-Hill Book, Inc., NY.

[5]Bourdan, R.M. 1997. Understanding Animal Breeding. Pp. 38-40. Prentice Hall, Inc., NJ.

The other phenotypic requirement revolves around the three Hereford branded beef programs. The basis for these programs (CHB Live Animal Specification, Schedule GL37, and Schedule GL46) [Appendix 6] is that "at least 51 percent of the head being white (bald, blaze, and/or brockle or motley markings are acceptable as long as they meet

the 51% white head requirements)." Genetically, white face is dominant, but like black hide, more than one breed possesses the trait. Simmental is the primary other breed that can meet the 51% white face specifications.

Each of the three Hereford programs has some language to remove Continental (breeds like Simmental are from Continental Europe as opposed to Hereford, Angus and Shorthorn which are British breeds) appearing cattle. The language of all the Hereford programs are similar to CHB's (Certified Hereford Beef), disqualifying cattle "showing phenotype typical of continental breeding such as extreme heavy muscling, double muscling or a large, continental-type head." This nebulous standard is extremely subjective, so it would remove some but not all Simmental cattle that otherwise would qualify. Also, Simmental crossed with red or black Angus or Shorthorn would not be sifted under these guidelines.

USDA allowance of breed claims based on phenotype runs counter to international standards. The following countries all require a minimum of one registered Angus parent to enter into their various Angus branded beef programs: Argentina, Australia, Brazil, Britain, Chile, New Zealand, and South Africa. In addition, Canada has a Feeder Calf Certification Program that requires that one parent be a registered Angus.

In conclusion, the USDA's current policy on allowing Breed Associations to set their own requirements, while strictly scrutinizing other groups, is arbitrary and capricious. This policy allows Breed Associations to make factually inaccurate and unverifiable claims using phenotypic live animal specifications that are misleading to consumers. Such a policy cannot be justified or defended. The Red Angus Association of America respectfully submits that the Breed Claims portion of the document must be amended so as to require that Breed Association claims be based upon verifiable genotypic data, and to require USDA involvement in verifying the data for Breed Association claims for the good of the industry and for the protection of the consumer.

On behalf of the Red Angus Association of America,

Bob Hough

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