



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

The Red Angus Association of America (RAAA) is concerned about the Source Verified section of the Federal Register. As written, it implies that: 1) Method of livestock identification; 2) Location(s) where livestock are born, raised, fed, harvested, and processed; and 3) Identification of the producer(s), must **all** be included to meet the standard.

Due to the segmented structure of the beef industry, cattle are sold several times before they are harvested and processed. Each segment markets a different product; cow calf producers sell feeder cattle to stockers, stockers sell stocker cattle to feed lots, feed lots sell fed cattle to packing plants, packing plants sell boxed beef to processors. At each change of ownership, there is an end product. If record keeping begins at birth and is maintained, each segment can source verify its product.

Feeder calf programs were created to add value to feeder cattle by providing information to the buyer such as genetics, health programs, and point of origin. The Red Angus Feeder Calf Certification Program (FCCP) was the first USDA audited, genotypic and source verified feeder calf program in the industry. The FCCP is one of the few feeder calf programs that individually identifies animals to source genetics as well as the producer and the location where the cattle were born and raised. The language of the current standard makes it unclear whether our program will be able to continue to claim that it is Source Verified.

While we do believe that individual animal identification utilizing a unique numbering system is necessary, and that all Source Verification must begin at birth, the RAAA asks for clarification so that each segment of the production system is considered separate, and that Source Verification can be claimed at each marketing opportunity.

Thank you for your time and consideration of our comments.

Sincerely,

Blake W. Angell
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