april 8, 2003
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Country of Origin Labeling Program
Agriculture Marketing Service, USDA
Stop 0249, Room 2092-S
1400 Independence Ave., SW
Washington, D.C. 20250-0249

Dear A.M.S.:

My family and I run a cow/calf/stocker operation near Belvidere S.D. Our comments pertaining to the mandatory Country of origin labelling rules are as follows. All live cattle that are exported to the United States should receive a permanent mark at the time of entry to the United States stating which country they originated from with that respective country bearing all the expense connected with this exercise and or that existing import documentation be kept with all imported animals until slaughter. Therefore any animal not marked with foreign markings (ear tags, tattoo, or brand) or not accompanied by required import documentation is declared to be an animal born, raised, and slaughtered in the United States and eligible for the USA label. Following slaughter the carcasses would be labelled according to the marks or import documentation records as to where they originated. Processors would then

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Keep that label on the meat as well as would the retailers allowing consumers the ability to make an intelligent decision on where their food is comming from.

Such a labeling system would remove any burden upon the United States producers who do not handle imported cattle; and it would keep the cost of COOL to a minimum for producers, processors, retailers and consumers. After all only 8% to 10% of the live cattle in the United States are from foreign countries.

All meat that comes to the ~~to~~ U.S. is already labeled at the packer level so keep the label on at the processor and retail levels. As for blended meat such as hamburger with meat from several countries list all the countries on the label in decending order and call it a blended product.

There is no need for U.S. producers to identify their live cattle because they would be U.S. cattle by default. As for certification based on other labeling programs USDA has in place and based on certification guidelines USDA is putting into place for importing fresh or frozen beef from countries such as Argentina and Uruguay, should be very simple.

As I understand it USDA only requires that meat coming from those importing countries be from cattle born raised and slaughtered in each repective country and that it be verified by the repective foreign country's veterinarian - that isn't much of a third party verification for purposes of determinating country of origin.

Both the "Made in U.S.A." country of origin label and U.S.D.A.'s requirements for importing beef from Argentina or Uruguay require beef to be from cattle that are born raised and slaughtered in their repective country. Why would U.S.D.A. hold a simple label that identifies where and which country the beef come from to a higher standard of verification than is required for imported meat originating from countries with a history of disease problems that would be disasterous not only to the U.S. cattle industry but also to U.S. overall economy?

The process for those who do not handle imported cattle would be easy; and in brand states another box on the brand inspection to act as an affidavit or a signed affidavit at the time of sale at the auction barn.

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After all a signed affidavit was good enough proof that U.S. producers had not fed bone meal or meat by-products to their cattle to prevent B.S.E. (Mad cow disease). U.S. producers should be able to self-certify the origins of their cattle. There is no need for third party verification as is suggested by several packer. I submit these comments for mandatory as well as voluntary country of origin labelling with a strong emphasis on the mandatory country of origin as voluntary country of origin has not worked.

Respectfully
Kenny Fox Ranch
Kenny Fox
Belvidere S.D.