Dear agiculture Marketing Service:

I am writing to comment on the proposed rules for country of origin labeling for meats, fish and produce. The costs stated by USDA to implement recordkeeping for COOL are grossly inflated for simple recordkeeping and fail to take into account for food labeling already required in several states, and accounting and inventory practices already conducted by the food industry, many of which are mandated by USDA itself. USDA has ignored recordkeeping that producers, food handlers and retailers already practice to comply with governmental rules.

I advocate a commonsense simple approach to guarentee that consumers have this information, using systems that are currently in place whenever possible.

USDA's report assumes that produce shippers and retailers would have to spend a considerable amount of time and money to create and maintain a recordkeeping system. USDA rules, under the Perishible Agiculture Commodities Act (PACA), already require sales records be kept for two years. Typical shipping and purchasing records contain information that would satisfy USDA's guidelines for recordkeeping under the origin labeling guidelines. This information could very

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easily be added to existing forms. Country of Origin Labeling for meat and or produce is currently required in seven states, Florida, Mississippi, Louisianna, North Dakota, South Dakota, Wyoming and Idaho. The minimal cost of compliance with a federal rule over and above state laws is in all reality a very small amount of money.

The burden of cost of labeling of meat and live cattle should be on the country or countries exporting to the United States for the simple reason there are far less numbers of cattle and meat exported to the United States than are produced in the United States. Imported live cattle make up about 7-8% of all cattle processed in the U.S. which tells me that about 92-93% of all cattle in the U.S.A. are automatically eligible for the U.S.A. Label and this does not include the nearly 10% of imported beef. Commonsense tells me that is a simple matter of economics to require the foreign live cattle and beef to be labeled rather the the 92-93% of U.S. live catte and beef to be labeled, thus eliminating a great deal of expense to producers of U.S. cattle, consumers and meat processors. Imported ~~live~~ cattle from Mexico could be branded with a permanent hot iron brand such as

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a M, or a C for Canada when they enter at the borders of the United States. Then when these aforementioned cattle are processed their carcasses could be stamped by a USDA inspector, which is already employed to grade the cattle anyway, as product of Mexico, Canada or any other country they have originated from. All imported meat must already carry the country of origin labels at the packing level. I understand that beef plants sort carcasses according to grade and that label is retained at the retail level. How much more could it cost to pass along the country of origin label information with the beef grade label? The costs of record-keeping for everyone would be significantly reduced to a minimum if adopted in these ways and consumers would be able to make an intelligent and informed decision as to where their food is comming from. It is a win win situation.

USDA does not account for the dramatically improved response to foodborne illnesses and food security threats country of origin labeling would provide.

May I remind you folks at USDA that country of origin labeling is not to be tied to in any way to an Animal I.D.

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system as was stated in the original intent of the law passed by Congress in the 2002 Farm Bill. Please Stop creating fear in the hearts of consumers, ranchers, farmers, processors and retailers with inflated costs for country of origin labeling. Everyone wants country of origin labeling implemented except those who are profiting off of the backs of producers and consumers. Get on with the implementation of COOL and stop creating hysteria with false and inflated costs concerning COOL.

Please consider these suggestions for the good of the American consumers, cattle producers and farmers. Thank you for allowing me to comment on COOL guidelines and taking time to consider my comments and suggestions.

Sincerely

Kenny Lee
P.O. Box 137, Belvidere, SD.
Chairman of Animal Health and Animal I.D. Committees of the South Dakota Stockgrowers association.