April 24, 2003

Country of Origin Labeling Program
Agricultural Marketing Service
USDA, Stop 0249
Room 2092-S
1400 Independence Ave. SW
Washington, D.C. 202050-0249
Fax: (202) 720-3499

Re: Listening Session
Country of Origin Labeling
May 1, 2003 – Austin, Texas

Ladies and Gentlemen:

Because of a previous commitment, I cannot attend the listening session on May first, but I would like to submit the following comments to you.

It is said that everyone has an agenda which dictates their position on issues. My agenda for COOL is to see that it is a win-win situation for the American Cattle Producer and the Consumer.

Everyone agrees that the Producer has lost market share in the last few years. I believe that the biggest cause of that is the increasing consolidation in the packer and feeder sectors. The producer needs to regain open and competitive markets, and one step toward this goal is to be able to brand our product as born, raised and harvested in the United States.

The Consumer has the right to know where the beef in the meat counter originates—the United States, a foreign country, or a blended product, and the labels should be clear and easy to read.

With these goals in mind, I would make the following suggestions for implementing COOL in the least burdensome manner for producers, packers, processors and retailers:

1. USDA should require all imported livestock to be permanently marked before it enters the United States, and throughout its procession through the system , ending with identification as imported in the meat case. All livestock not marked with this ID would be considered born and raised in the USA.
2. USDA should establish a "grandfather" clause so that cattle presently in the system can work their way through without penalty.
3. Because the packers do not want the extra expense of separating domestic and foreign beef, and because COOL would limit some of their ability to manipulate the market, they are threatening the producers with mandatory ID and yearly audits, among other things, in order to sabotage the law and make it unworkable. I would ask that USDA take steps to see that the packers and retailers cannot

impose these hardships on the producer. I don't want to impose hardships on the packers and retailers, either, so I would ask that USDA allow them time to phase in the changes needed to prepare for presentation of country of origin labeling to the consumer.

4. Suggestions for solving these problems are that USDA should be the only one authorized to conduct audits, and all suppliers and retailers must rely only on the markings on livestock or the representations made on sales transaction documents. Also, USDA should utilize existing paperwork transactions already used between packers, processors, and retailers to add a country of origin designation. Standardized forms would be helpful where no pre-existing documents are adaptable.
5. USDA should interpret the law to maximize the number of commodities that are to be labeled. Enhancing a commodity by adding water, flavoring, salt or other seasoning, or cooking, curing, roasting, or restructuring should not exclude a commodity from the labeling requirements.

Country of Origin Labeling is an idea whose time has come, and is good for the industry and the consumer. It requires some changes for each segment of the industry, but these changes need not be excessively expensive if common sense regulations are put into place.

I wish to thank the Agricultural Marketing Service, Ann Veneman, and USDA for the hard work and time spent working with us to find the best way to implement COOL.

Sincerely yours,

Rosalee Coleman

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