



April 13, 2017

Doug McKalip  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Avenue SW.  
Room 2619-S  
Washington, DC 20250-0216

**RE: Addition of Mandatory Country of Origin Labeling Requirements for Venison ( Doc. No. AMS-LPS-16-0014)**

Dear Mr. Doug McKalip,

On behalf of the United States Cattlemen's Association (USCA) and our nationwide membership of cow-calf operators, backgrounders and feedlot operators, we appreciate the opportunity to comment on the Proposed Rule for the Addition of Mandatory Country of Origin Labeling Requirements for Venison published by the U.S. Department of Agriculture (USDA) in the Federal Register on January 13, 2017 and February 17, 2017.

**Introduction**

The United States Cattlemen's Association supports the addition of muscle cuts of venison and ground venison to mandatory country of origin labeling (COOL) requirements. However, instead of removing references to beef from the definitions in § 65.230, 65.235, and 65.260, the mandatory COOL requirements should be harmonized with the entire spectrum of meat products by reintroducing beef products to the Mandatory COOL requirements. The rationale for adding new products to the mandatory COOL requirements is unjustified unless mandatory COOL requirements are also applied to beef products.

**Repeal of Country of Origin Labeling Requirements for Beef Products**

At the close of 2015, the mandatory COOL requirements for beef were repealed. Following this repeal, confusion in the marketplace has mounted as retailers and distributors have worked to adhere to the revised labeling policies. The repeal of mandatory COOL requirements for beef products represents a significant industry challenge. Nevertheless, workable compromises remain on the table.

Currently, USDA Food Safety and Inspection Service (FSIS) deals with origin claims on a 'case-by-case' basis, with no framework to carry out labeling requests. As a result, consumers are voicing their concerns about the lack of information and consistency in labeling at the meat counter. The confusion in the marketplace is an issue that must be addressed by the industry, and common ground must be found.

By repealing mandatory COOL requirements for beef, no clear definitions exist for what constitutes a truly U.S. born, raised and processed beef product. This is a fundamental flaw under the current labeling requirements. Cattle or beef that is imported into the U.S. and then undergoes further processing or handling may be labeled as a "Product of the United States" despite minimal change from the initial import, such as slaughter or seasoning, even if it was born and raised in another country. This flaw is highly misleading to consumers and undermines the efforts of producers to add value to their beef

products while incurring additional costs to ensure their cattle were born, raised, and slaughtered in the U.S.

Product labels are of the most important and direct means of communicating product information between seller and buyer. One of the primary functions of a product label is as a vehicle for marketing, promotion, and competition. Accordingly, producers earn the ability to distinguish their product as U.S. beef through the additional measures taken to tell the story of their product. The higher premium from the additional effort and costs incurred can only be recognized by the market with accurate, truthful labeling which is free from technical limitations of “significant transformation.”

### **Consumer Beliefs**

Consumers desire transparency and freedom of choice in the foods they purchase. According to a poll from Zogby International, 94% of consumers believe they have a right to know the country of origin of their food. 90% of the polled consumers believe knowing the country of origin will allow them to make safer food choices and about two-thirds go out of their way to buy locally produced food.

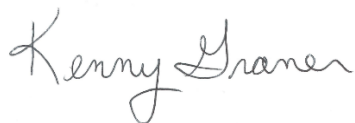
The ability of consumers to be aware of different feed, veterinary practices or husbandry practices used in raising imported beef or cattle is important in deciding which products to feed their families. In instances where production practices fall outside of consumers’ beliefs and value systems, as in the case of forced labor or practices causing drastic environmental damage, COOL provides consumers an informed choice to avoid those products. This accurate and transparent labeling also increases the ability of consumers and retailers to recognize products that have been recalled, based on origin.

### **Conclusion**

USCA supports the addition of venison to mandatory COOL requirements, only if beef are once again included in the program. Consumers must be presented with consistent labeling information in order to avoid confusion in the marketplace.

Thank you for the opportunity to comment. If you have any questions or need additional information, please contact the USCA Washington, DC office at (202) 546-4064.

Sincerely,

A handwritten signature in cursive script that reads "Kenny Graner".

Kenny Graner  
President  
United States Cattlemen’s Association