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October 10, 2001

FSIS Docket Clerk
Docket #00-036A
Department of Agriculture
Food Safety and Inspection Service
Room 102 Cotton Annex Building
300 12th St. SW
Washington, DC 20250-3700

RE: Country of Origin Labeling Rules

To Whom It May Concern:

It is very important to protect the integrity of the beef products
produced from birth to slaughter in the United States of America. The
best way to do this is to specifically label beef and beef products
that are derived from cattle that are born, raised and slaughtered in
the United States. The United States producers of cattle will benefit
from increased demand for their high quality cattle. The consumers
will benefit from the confidence of knowing exactly where their beef
products are raised and produced. As consumer confidence is increased
the entire beef industry will benefit from increased demand.

For the purposes of USDA labeling, the only beef that should be labeled
as USA Beef should be derived from cattle that are born, raised, fed
and slaughtered in the United States. The rationale for this is very
straightforward. It is important that all segments of the industry,
from cow calf producers to consumers, benefit from the labeling. To
label beef from cattle that are not born in this country with a USA
Beef label excludes the cow calf producer. To label beef from cattle
that are not fed in this country excludes the feeder. Cattle that are
slaughtered in the United States but born, raised or fed for a time in
another country should be identified as a product of both the countries
involved. If cattle are imported into the United States from Mexico,
then fed and slaughtered in the United States their beef should be
labeled as Mexican/American Beef. If cattle are born in the United
States, fed for a time in Canada then shipped back to the United States
for slaughter their beef should be labeled as Canadian/American Beef.

To verify these labels are accurate and truthful cattle that cross a
border into the United States will have to be identified. This need
not be a complicated system. Cattle imported to the United States from
Mexico are hot iron branded with an "M" near their tail head. This
brand marks them for life. They can be sorted and grouped before they
enter a slaughter facility. When they are slaughtered it will then be
possible to process them together and label the beef from them
accurately. The same can be done with fat cattle imported from Canada

for immediate slaughter. They are shipped in sealed trucks so they are already sorted and grouped when they arrive at the slaughter facility. Although this type of labeling will require organizational effort to track the beef through the slaughter facility from slaughter to packaging the cost would be minimal.

Industry and FSIS can aid consumers in gaining a greater understanding of the suggested terms by maintaining consistency. It would be confusing to allow any beef to receive the USDA quality grade that is not labeled as USA Beef. As the consumer equates the USDA quality grade with US production, its use must be limited to carcasses that are derived from cattle that are born, raised and slaughtered in the United States. Studies have already identified that food safety is the highest priority of the consumer of beef. This type of labeling will enhance consumer confidence by enabling beef to be traced back to its county of origin.

Sincerely,

Bill Garrison
President
Montana Stockgrowers Association