



# OKLAHOMA FARMERS UNION

"The Voice of Family Farmers since 1905"

RAY L. WULF, President  
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October 5, 2001

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

To Whom It May Concern:

On behalf of 120,000 Oklahoma Farmers Union members, I am writing in response to the proposed rule-making regarding the definition and labeling of U.S. cattle and beef products.

Oklahoma Farmers Union strongly supports the Food Safety Inspection Service's current definition for voluntary labeling of cattle and beef products as "born, raised, slaughtered and processed in the United States." All other definitions would mislead consumers and damage the integrity of the U.S. beef industry.

Oklahoma Farmers Union opposes the petition submitted in September 2000 that would allow imported beef products to be fed in the U.S. for 100 days, processed in the United States and receive a country-of-origin label, "Beef: Made in the U.S.A." Only beef products born, raised, slaughtered and processed in the U.S. should be labeled as products of the United States of America. A better terminology could be "Beef: Born and Raised in the U.S.A."

United States cattle producers spend significant time, money, resources and energy producing top quality livestock. FSIS request, in the Federal Register, comments on four questions to address the issues. Questions one and three should also address the domestic producers of cattle as much as the packers and processors of beef.

Domestic production would be dramatically affected by defining which U.S. cattle and fresh beef products are products of the United States. Oklahoma produces approximately 1.8 million head of 500 pound calves each year. Imported live cattle can affect the market price of these calves sold by U.S. producers as much as \$10 per hundred weight. An increase of this class of cattle could cause a **\$90 million loss** in revenue to Oklahoma's producers. As the Federal Register stated, "For many years, 'Product of the U.S.A.' has been applied to products that are exported to other countries to meet those countries' country-of-origin labeling requirements." Given this requirement there should be no impact on international markets.

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Currently all cattle marketed in the U.S. must have a signed statement by the producer that no mammalian by-product or illegal drugs have been administered to the cattle. Live cattle or beef products from other countries may not require this same level of quality. "Madcow disease" or B.S.E. can remain in the animal tissue on these live cattle or beef products for an indefinite length of time. In addition, researchers remain uncertain if this disease is passed to offspring of cattle that have been fed contaminated by-products. Therefore, cattle and beef products born and partially raised in another country should not be labeled under the same category as those born, raised, slaughtered and processed under the United States of America's unparalleled standards.

Our nation has an international reputation for growing and producing high quality beef. Labeling can be a valuable marketing tool to promote U.S. products and allow producers to better compete in the marketplace. As a matter of choice, consumers should be given the option of choosing between purchasing imported meat or meat from animals born and raised under strict U.S. standards.

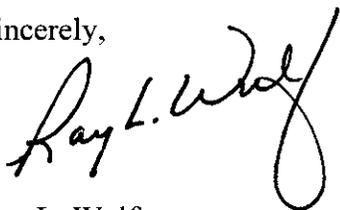
In answering number three of the comments, FSIS currently requires labeling of foreign products. According to FSIS policy, "all products imported into the United States are required to bear the name of their country of origin on the container in which they are shipped, as well as the number assigned by the foreign meat inspection system to the establishment in which they were prepared." We further recommend identification branding or ear tattooing be required on all live animals imported into the U.S. for future slaughter.

Question number four should focus on the consumer trust of production agriculture. Consumers must have trust in the quality of the product. FSIS should not mislead consumers by labeling a product with less-than-accurate information. FSIS should develop rules concerning country-of-origin labeling of beef products with high quality and accurate nutritional labeling. Consumers should be given the option of choosing between purchasing **imported** meat or meat born, raised and processed under strict U.S. standards.

The clothes we wear as well as other manufactured goods bear country-of-origin labels. Accurate and honest labels on the food we feed our families should bear the same country-of-origin label. Oklahoma Farmers Union strongly supports a mandatory labeling program with a uniform definition for domestic beef as born, raised, slaughtered and processed in the United States of America.

It is our hope that FSIS will implement meaningful labeling regulations for cattle and beef products.

Sincerely,

A handwritten signature in black ink that reads "Ray L. Wulf". The signature is written in a cursive style with a large, looping "W" at the end.

Ray L. Wulf  
President & CEO