



TENNESSEE DEPARTMENT OF AGRICULTURE

Dan Wheeler
Commissioner

Don Sundquist
Governor

October 19, 2001

1029

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

To Whom It May Concern:

The Tennessee Department of Agriculture **OPPOSES** the petition submitted in September 2000 that would allow imported cattle to be fed in this country for 100 days to be labeled, "Beef: Made In The USA."

The Tennessee Department of Agriculture has responsibilities that include food safety, protection of animal and human health, and the marketing promotions of Tennessee products. The acceptance of the proposal contained in Docket#00-036A would mislead consumers in the U.S. and would cause serious concerns as to the safety of the meat and meat products derived from imported cattle later fed in this country.

The U.S. has been very successful in the battle against diseases that affect our livestock and in turn could affect human health. Allowing foreign produced cattle to be introduced into U.S. feedlots and labeled as U.S. beef would greatly mislead U.S. consumers in assuming that the beef they purchase is "home-grown" and free of any of the diseases that we see in other countries such as Foot-and-mouth disease and bovine spongiform encephalopathy (BSE). Some diseases of concern have an incubation period of more than the minimum 100 days the cattle would be required to be in this country.

The beef industry in the United States is committed to providing a safe, nutritious and wholesome product designed to meet the culinary preferences of the American consumer. Many producers have dedicated a lifetime to developing the genetics within their herd and the quality assurance practices on their farm/ranch to reflect those goals. Products inappropriately labeled to infer that beef purchased by the American consumer mirror the genetic and quality assurance practices promoted by the U.S. beef industry substantially compromises the many accomplishments of our own cattle producers.

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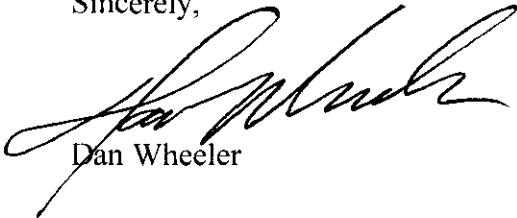
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The unfair competitive edge this change in labeling policy offers to other countries also increases the potential for the introduction of beef containing drug or hormonal residues with a lack of accountability to the foreign beef producer responsible for creating a residue problem. The problem would be further accentuated by inaccurate identification of carcass tissues by FSIS, which has been a continuing problem and significantly compromises the ability to trace disease or residue problems back to the herd of origin.

Finally, the unfair competitive edge this offers to other countries exporting foreign beef escalates the risk for introducing a foreign animal disease such as foot-and-mouth disease or BSE. Given the mobility of animals in commerce and the relative ease animals can move into our country, "opening the door" through laws or rules that create an unfair advantage to foreign beef producers and offer additional incentives to bring cattle into our country, greatly increases the risk for the introduction a foreign animal disease that would have devastating economic consequences to our beef cattle industry.

Allowing the proposal in the petition would greatly reduce the high degree of confidence consumers have in the safety of foods produced and processed in the U.S. In the end, the proposed change is inaccurate and is contrary to what the mission of FSIS should be, that is, to protect the American consumer and support the American economy.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Wheeler", written over a printed name.

Dan Wheeler

CC: Ann Veneman, USDA Secretary of Agriculture