

EXHIBIT C

SECOND DECLARATION OF WILLIAM BULLARD IN
SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY
JUDGMENT - 29

Case No. 2:17-cv-00223-RMP



Consumer Federation of America

FOR IMMEDIATE RELEASE
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Large Majority of Americans Strongly Support Requiring More Information on Origin of Fresh Meat

*New Poll Shows Strong Support for USDA's Approach to
Resolving Country of Origin Labeling Dispute*

Survey results, released today by the Consumer Federation of America, show that a large majority of Americans continue to strongly support mandatory country of origin labeling for fresh meat and strongly favor requiring meat to be labeled with even more specific information about where the animals were born, raised and processed.

Ninety percent (90%) of a representative sample of 1000 adult Americans favored, either strongly or somewhat, requiring food sellers to indicate on the package label the country of origin of fresh meat they sell. This high level of support for country of origin labeling is similar to the results of previous polling on the issue.

Eighty-seven percent (87%) of adults favored, either strongly or somewhat, requiring food sellers to indicate on the package label the country or countries in which animals were born, raised and processed. Similarly, ninety percent (90%) of adults favored, either strongly or somewhat, requiring food sellers to indicate on the package label the country or countries in which animals were born and raised and the fact that the meat was processed in the U.S. The U.S. Department of Agriculture (USDA) has proposed changing its country of origin regulations to provide consumers with this additional information in response to a World Trade Organization (WTO) challenge by Canada and Mexico.

"These results demonstrate that U.S. consumers continue to strongly support country of origin labeling and want even more detailed information about where their meat comes from," said Chris Waldrop, Director of the Food Policy Institute at Consumer Federation of America. "We urge the Administration to finalize its proposal and provide consumers with this additional information. The WTO should accept USDA's changes to the COOL regulations as satisfactory."

In 2002 Congress required mandatory country-of-origin labels for meats, poultry, vegetables, fruits, and some nuts. These requirements were then expanded in 2008 and implemented by the USDA. Soon after the law went into effect, Canada and Mexico challenged the COOL law at the WTO, alleging it was a barrier to trade. The WTO upheld the rights of the United States to require country of origin labeling, but found that the current COOL labels for meat cuts imposed a cost to imported livestock and meat that exceeded the consumer benefit because of the limited and confusing information on COOL labels. The WTO gave the United States until May 23, 2013 to change the COOL rules to meet the WTO concerns.

In order to address the WTO’s findings, USDA has proposed changing COOL regulations so that country of origin labels specify the country in which the production steps of birth, raising and slaughter of the animal occur. Thus a muscle cut from an animal born, raised and slaughtered in the United States would carry a label with that information while muscle cuts from an animal born and raised in one country and sent for slaughter in the U.S. would carry a label that says “Born and Raised in Country X and Slaughtered in the United States.” Designating the production steps on the label provides more clear and precise information to consumers than the current requirements and addresses the concerns raised at the WTO. A coalition of 229 farm, consumer, rural, faith and environmental organizations from 45 states, including CFA, [wrote to the Department](#) in support of USDA’s proposed changes.

The telephone survey was undertaken by ORC International May 9-12, 2013, using a split sample of landlines and cell phones. The margin of error is plus or minus three percentage points. The survey results are available [here](#) and the survey methodology is available [here](#).

Question 1: Are you in favor of requiring food sellers to indicate, on the package label, the country of origin of the fresh meat they sell—that is, where the meat came from originally? Would you say you...

Favor Strongly	69 percent
Favor Somewhat	21 percent
Combined Favored	90 percent
Oppose Somewhat	4 percent
Oppose Strongly	3 percent
Combined Oppose	7 percent
Don’t Know	2 percent

Question 2: Animals like cattle and hogs can be born in one country, raised in another country, and processed in a third country. The U.S. Department of Agriculture is proposing that food sellers be required to indicate, on the package label, the country or countries where each of these activities takes place. Do you favor or oppose this required disclosure? Would you say you...

Favor Strongly	64 percent
Favor Somewhat	23 percent
Combined Favored	87 percent
Oppose Somewhat	7 percent
Oppose Strongly	5 percent
Combined Oppose	12 percent
Don’t Know	1 percent

Question 3: At present, beef products from animals born and raised in one country and processed in the U.S. are labeled simply as a product of both countries. The U.S. Department of Agriculture is proposing that, for meat products from these animals, food sellers be required to indicate, on the package label, the country or countries where the animal was born and raised, and the fact that the meat was processed in the U.S. Do you favor or oppose this required disclosure? Would you say you...

Favor Strongly	64 percent
Favor Somewhat	26 percent

Combined Favored	90 percent
Oppose Somewhat	5 percent
Oppose Strongly	4 percent
Combined Oppose	9 percent
Don't Know	1 percent

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Consumer Federation of America is an association of nearly 300 nonprofit consumer organizations that was established in 1968 to advance the consumer interest through research, advocacy and education.