

December 9, 2019

The Honorable Mike Rounds
United States Senate
502 Hart Senate Office Building
Washington DC 20510

The Honorable John Thune
United States Senate
511 Dirksen Senate Office Building
Washington DC 20510

Re: Senate Bill 2744, The U.S. Beef Integrity Act

Dear Senators Mike Rounds and John Thune:

We, the organizations signed below, urge you to amend S.2744, The U.S. Beef Integrity Act, so it will correct the current misuse of the “Product of USA” label on imported beef products *within* a comprehensive mandatory country-of-origin labeling (COOL) bill. The problem S.2744 attempts to correct is only one of the several serious problems created by the repeal of mandatory COOL for beef and pork. We believe that correcting just that one isolated issue will have the unintended consequence of undercutting our ongoing efforts to fully reinstate mandatory COOL for beef and pork.

Mandatory COOL requires that covered meat products bear a label as to where the animal or bird from which the meat was derived was born, raised, and slaughtered. As part of that, mandatory COOL requires that any imported meat retain its foreign labels through retail sale, meaning all the way to the consumer.

The repeal of mandatory COOL for beef and pork eliminated this requirement and allowed the U.S. Department of Agriculture to revert back to its pre-COOL era policy of treating all imported beef and pork as domestic products upon entering the United States. The misuse of the “Product of USA” label on imported meat thus stems directly from the repeal of mandatory COOL.

Attempting to correct this single problem with stand-alone legislation, rather than reinstating mandatory COOL in its entirety, will unnecessarily complicate the efforts of U.S. cattle and hog farmers who desire to have their exclusively U.S.-produced beef and pork differentiated in America’s consumer market.

One problem with this stand-alone measure is that it would create an inconsistent standard with chicken and lamb. Chicken and lamb remain subject to mandatory COOL, and thus the “Product of [Country X]” label is applicable only to imported covered chicken and lamb products, and there is never a “Product of USA” label on those meats. Thus, providing a statutory change to what constitutes a “Product of USA” beef or pork product would conflict

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with the statutory system already in place for meat products such as chicken and lamb. It would be less confusing for consumers, as well as better for American ranchers, for beef and pork to be reinstated under the COOL labeling system already in place for these other meats.

More importantly, without mandatory COOL, America's cattle and hog producers have no assurance that the beef and pork derived from the animals they sell will ever be labeled as to their origin when sold to consumers in U.S. grocery stores. And, they are without the means to *cause* their superior, USA-produced beef and pork to be labeled as exclusively born, raised, and slaughtered in the United States.

Simply stopping foreign-raised products from being deceptively labeled as "Product of USA," while a proper step, does not address this far more serious problem at all.

While we are without data to show what volume of beef and pork would even be covered by your voluntary U.S. Beef Integrity Act, we expect it to be small in relation to the volume of beef and pork produced exclusively in the United States. The bill thus addresses the most obvious labeling abuse for consumers, and in the process weakens the effort to pass comprehensive reforms that benefit both consumers and producers.

In summary, while we are interested in correcting the mislabeling of imported beef, we firmly believe that addressing this issue in a stand-alone, voluntary measure is harmful to our ongoing, collective efforts to fully restore mandatory COOL for beef and pork. For this reason, we urge you to help us achieve our objective by amending S.2744 so cattle and hog producers in South Dakota and all other states will, once again, have the ability to offer their exclusively U.S.-produced meat products to American consumers.

Please contact any of the organizational signatories below to let us know how we can help in reinstating a comprehensive labeling system for beef and pork that will truly benefit America's cattle and hog producers.

Sincerely,

American Agriculture Movement

American Federation of Government Employees, Local 3354 (AFL-CIO)

Buckeye Quality Beef (OH)

Cattle Producers of Louisiana

Cattle Producers of Washington

Coalition for a Prosperous America

Colorado Independent CattleGrowers Association

Colorado Women Involved in Farm Economics

Community Alliance for Global Justice

Community Farm Alliance

Consumer Federation of America

Contract Poultry Growers Association of the Virginias

Dakota Resource Council

Dakota Rural Action

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Family Farm Defenders

Farm Aid

Farm and Ranch Freedom Alliance

Farm Women United

Food & Water Watch

Government Accountability Project Food Integrity Campaign

Independent Cattlemen of Nebraska

Independent Cattlemen of Wyoming

Institute for Agriculture and Trade Policy

Missouri Rural Crisis Center

Missouri's Best Beef Co-Operative

Murray County, Oklahoma Independent Cattlemen's Association

National Family Farm Coalition

National Latino Farmers and Ranchers Trade Association

National Women Involved in Farm Economics

Nebraska Women Involved in Farm Economics

North Dakota Women Involved in Farm Economics

Northeast Organic Dairy Producers Alliance

Northeast Organic Farming Association - New Hampshire

Northeast Organic Farming Association - New York

Northeast Organic Farming Association Interstate Council

Northern Plains Resource Council

Northern Wisconsin Beef Producers

Oglala Sioux Livestock and Land Owners Association

Oklahoma Independent Stockgrowers Association

Organization for Competitive Markets

Public Justice

Range Allotment Owners Association

R-CALF USA

Rocky Mountain Farmers Union

Rural Advancement Foundation International (RAFI-USA)

Rural Coalition

South Dakota Citizens for Liberty

South Dakota Stockgrowers Association

Spokane County Cattlemen, WA

State of Missouri National Association for the Advancement of Colored People, Agriculture Committee

Stevens County Cattlemen's Association (WA)

United Food and Commercial Workers International Union (UFCW)

Wyoming Women Involved in Farm Economics

Cc: Members of U.S. Senate