

R-CALF United Stockgrowers of America

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June 23, 2008

The Honorable Rosa DeLauro
Chairwoman
U.S. House Appropriations Subcommittee on
Agriculture, Rural Development, Food and Drug
Administration and Related Agencies
U.S. House of Representatives
2262 Rayburn House Office Building
Washington, DC 20515

Sent Via facsimile and E-mail

Re: Proposed Requirements for the National School Lunch Program

Dear Chairwoman DeLauro:

On behalf of the thousands of U.S. farmers and ranchers who raise and sell live cattle and who are members of the Ranchers-Cattlemen Action Legal Fund, United Stockgrowers of America (R-CALF USA), thank you for your aggressive efforts to improve the safety of the beef produced from our members' cattle.

We understand that in furtherance of your food safety efforts, you are proposing in the 2009 annual agricultural appropriations bill to require that only beef derived from cattle that participate in the National Animal Identification System (NAIS) would be eligible for purchase by the national school lunch program. We respectfully ask that you reconsider this proposal for the following reasons:

- 1. Any trace-back capability contemplated by the current NAIS program effectively ends upon the death or slaughter of live cattle there is no mechanism in place to trace-forward the resulting beef from an NAIS-participating animal.
- 2. U.S. farmers and ranchers already are operating on extremely tight margins due to the present economic cost/price squeeze, and there have been no studies to determine if the NAIS is economically feasible for family farmers and ranchers. For example, the Food and Agricultural Policy Research Institute (FAPRI) predicts that economic returns to farmers and ranchers who own mother cows and who sell calves will fall to a negative \$17.62 per cow in 2009, and returns will continue to remain negative for the ensuing

- seven years, hitting a low of a negative \$51.87 per cow in 2012. Thus, the imposition of the cost for NAIS may well be financially untenable for U.S. family farmers and ranchers.
- 3. The safety of the U.S. beef supply has not been compromised by U.S. farmers and ranchers. Instead, the safety of the U.S. beef supply has been compromised due to the U.S. Department of Agriculture's (USDA's) failure to provide adequate oversight and enforcement of existing health and safety standards. For example, the Westland-Hallmark fiasco was the direct result of USDA's failure to enforce the prohibition against the slaughter of downer cattle for human consumption, and the NAIS could not have mitigated this failure.

For the foregoing reasons, we hope that you will withdraw your proposal and, instead, work to improve USDA oversight and enforcement of the meatpacking industry where the safety of beef can best be assured through adherence to health and safety rules. We also believe that in addition to country-of-origin labeling on all beef products, Congress should enact legislation to require the full disclosure of the meatpacking company where the animal was slaughtered whenever adulterated beef is detected. Presently, the USDA only discloses the name of the processing plant where the beef was last processed, but not the slaughtering plant where the beef was actually susceptible to contact with enteric-born bacteria such as *E-coli*.

Chairwoman DeLauro, we share your keen desire to improve the safety of our food supply, including, of course, the safety of beef fed to our nation's school children. We believe that your current proposal would cause harm to the financial viability of our nation's family farmers and ranchers without addressing the source of food safety problems. This, unfortunately, would facilitate the ongoing trend toward the industrial integration and concentration of our nation's cattle production industry. We pledge to work with you to formulate a more effective solution to the problems you have identified.

Our organization's CEO will contact your office by phone to discuss how R-CALF USA may assist you in your efforts to ensure the safety and wholesomeness of U.S. beef.

Sincerely,

R. M. Thornsberry, D.V.M.

President, R-CALF USA Board of Directors

¹ U.S. Beef Supply and Utilization, FAPRI 2008 U.S. and World Agricultural Outlook, Food and Agricultural Policy Research Institute, Iowa State University, available at http://www.fapri.iastate.edu/outlook2008/tables/7USTables.pdf.