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
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 Cattle Growers 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 Virginiass
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