

VIA FACSIMILE: (202) 720-5775

September 24, 2008

Undersecretary Bruce Knight  
Marketing and Regulatory Programs, USDA  
14<sup>th</sup> and Independence, S.W.  
Washington, D.C.

Dear Secretary Knight,

The American Farm Bureau Federation appreciates the work USDA is trying to do in order to implement the Mandatory Country of Origin labeling law (COOL) and the release of the Interim Final Rule (IFR.) However we are concerned about USDA's interpretation of COOL, as passed by Congress, which allows for exclusively U.S. born, raised and slaughtered meat to be labeled as product of mixed origin and from multiple countries.

Farm Bureau supports COOL. Farmers and ranchers are looking forward to the implementation of this law and purchasing U.S. products properly labeled in their local grocery stores. There is now great concern that there will not be any exclusively U.S. labeled meat because many within the industry have said that the only label they will use is "Product of the U.S., Canada, or Mexico." Farmers and ranchers are being told by some processors that unless they check the multiple origin label box on their producer affidavits, they will be audited. This information is completely discouraging to a producer not to mention the fact that it is not a true statement.

The livestock industry worked diligently in preparation for the meeting in Kansas City on August 26 and had a lively discussion that day ultimately achieving agreement on universal language to be included in producer affidavits. We appreciate your personal participation in that meeting as well as that of your colleagues at USDA. Virtually every segment of the livestock industry, including producers, packers, livestock markets, feedlots and retailers, participated in that discussion. Farm Bureau felt confident that the agreement reached that day would boost confidence within all industry segments that origin declaration and verification information could be easily passed along and accessible to those on the "front line" who were held accountable for the proper labels at the retail outlet.

We ask that USDA conduct a "nationwide retail meat labeling survey" this year in order to discern how much product, which product, and where exclusively U.S.-labeled meat is being sold. This survey will provide producers, as well as lawmakers, objective information to base their decision as to whether the law or the IFR should be amended. Farm Bureau believes an objective and thoughtful survey could be achieved by USDA in a timely manner.

Once again, Farm Bureau appreciates your diligence on working to implement COOL and looks forward to your reply to this request.

Sincerely,



Bob Stallman, President