



August 16, 2018

Ms. Mary Porretta, Petitions Manager, Issuances Staff
U.S. Department of Agriculture
Food Safety and Inspection Service
Office of Policy and Program Development
1400 Independence Avenue, SW
Washington, D.C. 20250-3700

Submitted Electronically

Re: Comments on Petition 18-05 – Petition to Revise FSIS Standards and Labeling Policy Book on
“Product of U.S.A.” Labeling

North Dakota Farmers Union (NDFU) appreciates the opportunity to comment on Petition 18-05 requesting the U.S. Department of Agriculture, Food Safety and Inspection Service (FSIS) clarify the “Product of U.S.A.” label for meat and meat products. NDFU, the largest general farm organization in North Dakota, represents more than 40,000 farm and ranch families and their energy and agriculture supply cooperatives. NDFU’s member developed policy positions have long supported accurate country-of-origin labeling for meat and meat products.

The current FSIS labeling policy for “Product of U.S.A.” allows foreign raised meat and meat products to be labeled as a “Product of U.S.A.” simply because the meat or meat product is processed in the United States (U.S.). Correct country-of-origin labeling is a valuable marketing tool for family farmers and ranchers because it allows consumers to know where their food is produced. The current policy is harmful to family farmers and ranchers because they are not able to differentiate their domestically produced meat and meat products from foreign meat and meat products by using the “Product of U.S.A.” label. Allowing foreign meat and meat products to be labeled as a “Product of U.S.A.” is misleading to U.S. consumers who believe they are buying domestically raised meat and meat products.

The current FSIS labeling policy for “Product of U.S.A.” must be clarified to ensure U.S. consumers are not misled or deceived by inaccurately labeled meat and meat products and to prevent further harm to U.S. family farmers and ranchers. Although NDFU would prefer mandatory country-of-origin labeling for agriculture products, NDFU supports the request that FSIS clarify the “Product of U.S.A.” language in its Food Standards and Labeling Policy Book so only meat and meat products from an animal born, raised, harvested, and processed in the U.S. may be labeled as a “Product of U.S.A.”

NDFU respectfully requests FSIS clarify the label for “Product of U.S.A.” in support of Petition 18-05 filed by the Organization for Competitive Markets and American Grassfed Association.

Sincerely,

NORTH DAKOTA FARMERS UNION

Mark Watne
President