



January 30, 2020

Food Safety and Inspection Service Docket Clerk  
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  
ATTN: Docket ID No. FSIS-2019-0024

Submitted Electronically

Re: Docket ID No. FSIS-2019-0024—The U.S. Cattlemen's Association (USCA)  
Petition for the Imposition of Beef Labeling Requirements: To Address "Made in  
USA" or "Product of USA" Claims

Dear Docket Clerk:

North Dakota Farmers Union (“NDFU”) appreciates the opportunity to comment on the Petition in Docket ID No. FSIS-2019-0024 (“Petition”). NDFU, the largest general farm organization in North Dakota, represents more than 50,000 farm and ranch families, members, and their energy and agriculture supply cooperatives. NDFU’s member developed policy positions have long supported accurate labeling of meat and meat products.

Although NDFU prefers mandatory country-of-origin labeling for agricultural products, the voluntary “Product of U.S.A.” label is the only existing mechanism for indicating whether or not pork or beef products are derived from animals born, raised, and harvested in the United States. As NDFU stated in response to Petition 18-05 on August 16, 2018, we believe the definition of “Product of U.S.A.” should be revised to promote transparency, protect U.S. farmers’ and ranchers’ market share, and prevent consumer confusion.

Accordingly, NDFU supports the Petition which requests the Food Safety and Inspection Service (“FSIS”) revise its Food Standards and Labeling Policy Book to limit the use of the “Product of U.S.A.,” “Made in U.S.A.,” “U.S.A. Beef,” and other similar label distinctions, to meat and meat products derived from an animal born, raised, and harvested in the United States. NDFU further requests FSIS require the production steps be listed when the “Product of U.S.A.” label is used (i.e. “Born, Raised, and Harvested in the United States”). We urge these standards to be applied to all meat and meat products, in particular beef and pork which are not currently subject to mandatory country-of-origin labeling.

The current FSIS policy allows a product to be labeled “Product of U.S.A.” if it is processed in the United States. This permits products derived from foreign born, raised, and even slaughtered animals to be labeled “Product of U.S.A.” simply because they are processed in

the United States. Under this policy, family farmers and ranchers are put at a disadvantage because they are not able to differentiate their domestically produced meat and meat products from foreign produced meat and meat products. Allowing foreign meat and meat products to be labeled “Product of U.S.A.” is misleading to consumers who believe they are buying meat and meat products derived from an animal born, raised, and harvested in the United States.

It is imperative FSIS adopt regulations which clarify the use of the “Product of U.S.A.” label and limit its use to meat and meat products derived from animals born, raised, and harvested in the United States. Accurate country-of-origin labeling is a valuable marketing tool for family farmers and ranchers and a key tool employed by consumers when purchasing meat and meat products. Revising FSIS’s policy would safeguard consumers from being deceived by inaccurately labeled meat and meat products. The requested revisions would also ensure family farmers and ranchers are able to distinguish their products from those of other countries, expanding opportunities to receive market premiums.

NDFU fully supports the Petition and urges its broad application to all meat and meat products. We urge FSIS to act quickly to make the requested revision and promote accurate, transparent labeling of all products under its jurisdiction.

Sincerely,

NORTH DAKOTA FARMERS UNION



Mark Watne  
President

