

January 30, 2020

Via Electronic Filing ([www.regulations.gov](http://www.regulations.gov))

U.S. Department of Agriculture  
Food Safety and Inspection Service  
1400 Independence Ave., S.W.  
Washington, D.C. 20205-3700

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

To whom it may concern,

The South Dakota Farmers Union (SDFU) is grateful for the opportunity to present comments to the US Department of Agriculture Food Safety and Inspection Service in support of the above captioned Docket No. FSIS-2019-0024 (hereafter, "the Petition").

SDFU is the largest agriculture organization in the state of South Dakota, representing nearly 19,000 family farmers, ranchers and rural residents, many of whom have demonstrated unwavering support for U.S. origin beef labeling laws and the reinstatement of mandatory Country of Origin Labeling (COOL). In accordance with the Petition, it is our shared belief that only products entirely of domestic origin should bear the name "Product of USA," "American Beef," "Made in the USA," or any other label that would lead a consumer to believe the product is derived from cattle born, raised and processed in the US.

While SDFU understands the World Trade Organization (WTO) ramifications of mandatory COOL, we also understand there are loop holes in the current US beef labeling practices which require closure. It is apparent that the US Beef Integrity Act will close these loopholes by requiring that US domestic beef products must be born, raised, and slaughtered in the US. The US Beef Integrity Act also remains compliant with the WTO because of three reasons; 1) does not violate other countries domestic labeling laws, 2) does not require origin labeling for foreign beef, it expands on an already existing, voluntary US beef product label and 3) compares very closely to the Canadian "Product of Canada" label with the exception that feeder cattle will not allow cattle fed for 60 days in the US to attain a Product of USA label if they are not born domestically.

The American consumer has communicated time and time again that they want to know where their beef comes from and feel source of origin is a major factor in purchasing decisions. We implore the Food Safety and Inspection Service (FSIS) to return educated purchasing power to the consumer, eliminate confusion caused by unnecessary and misleading marketing claims, and close labeling loopholes.





1410 Dakota Avenue South PO Box 1388  
www.sdfu.org Huron, SD 57350 605.352.6761

---

For ranchers in our membership and across the country, the labeling requirements detailed in the Petition would be a game-changer for their operations, breaking down the divide between them and the consumer. American ranchers abide by strict standards to ensure they are producing quality cattle and want to proudly proclaim its origin when their beef products make their way to the grocery store.

With the best interest of both the American consumer and rancher in mind, we urgently ask the FSIS to break down barriers, recognize the truest origin of cattle, and limit the definition of U.S. beef to cattle born, raised, and processed in the United States as detailed in the Petition.

On behalf of our membership, I thank you in advance for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Doug Sombke".

Doug Sombke  
President, South Dakota Farmers Union

