



Country-of-Origin Labeling

Iowa Beef Center

<http://www.iowabeefcenter.org/content/COOL.htm>

The following information was copied from the Iowa Beef Center website and gives an overview of what is expected of cow-calf producers to comply with mandatory country of origin labeling (mCOOL) which will begin September 28, 2008.

Many Iowa producers have received letters in the mail from packing plants asking for documentation on animals as we reach the Sept. 30, 2008 deadline for mandatory Country-of-Origin Labeling (COOL) compliance. Feedlots may be asking for country-of-origin confirmation on calves purchased this fall because packers will ask for verification on any animals beginning in the fall of 2008.

Beef products will be labeled a product of the United States if they are born, raised, and slaughtered in the United States. Beef products shall be designated as a "product of the United States and Country X" if they are imported as feeder animals from either Canada or Mexico and are fed in the United States before going to slaughter. Beef products from cattle imported for immediate slaughter from Country X will be designated as "product of Country X and the United States." Currently, feeder cattle imported from either Mexico or Canada are permanently identified with a brand. However, buyers may still request a signed affidavit from the seller declaring the origin of the cattle.

The USDA has not specified a single record system to use. Cowherd owners should develop a record system to document that the calves born on their farms are "products of the U.S." While not required, tagging calves and recording birth dates, tag number, and a description of the calf in a calving book would be a good place to start. Another strategy may be an established record system like the Iowa Green Tag program or a private sector electronic identification system. In

both cases the cattle are entered into a formal database. Keep in mind that you likely will be asked for this documentation if you sell the cattle. Sellers may be asked to provide an affidavit declaring the origin of the cattle. Typical business records are sufficient to prove origin of cattle if an audit occurs. Cattle producers with production and financial records should feel confident providing a signed affidavit.

Country-of-Origin Documentation Recommendations At-A-Glance

Cow-Calf Producers: To begin building a good foundation for verification, producers can begin with:

- Ear tags
- Calving books
- Herd inventories
- Purchase receipts of herd animals
- Sale bills from sold animals

Feedlots: Cattle feeders will also need to document that cattle were "raised" in the U.S. Appropriate documentation can include:

- A declaration of origin from the seller
- Scale tickets with in- and out-weight
- Closeout records

Feedlots will need documentation on where the cattle were before the feedlot, place of birth and stocker operation.

Feedlot owners need to begin thinking about what type of documentation they will require from

sellers and how that information will be transferred through the marketing channel (auction market, order buyer, trucker). Cattle feeders should also discuss COOL with their buyers to determine what information must be forwarded with the cattle when sold.

As proposed, COOL will require retailers to develop and maintain an audit trail on the products they sell to verify the label indicating the country of origin. Members of the supply chain will have to keep sufficient records to support their claim of origin.

Buyers should request a signed affidavit from the seller identifying the date of sale, number of animals, seller contact information, and the

country where the animals was born and raised prior to sale (see sample form at www.iowabeefcenter.org).

The buyers should maintain the records listed below and be able to provide the documents if audited. USDA has also identified common production and business that are acceptable. Auction markets, order buyers, and other market intermediaries should maintain records and sign as the seller, or pass the seller's information to the buyer.

Sellers that sign the affidavit are responsible for maintaining adequate records to support country of origin claims if audited.

A collation of Iowa agricultural organizations prepared the following suggestions to meet the MCOOL rules.

Examples of documents to maintain for at least two years as an audit trail.

Buyers of livestock	Original producers of livestock
<ul style="list-style-type: none"> ● Signed affidavit from seller of livestock ● Bill of sale ● Health papers ● Brand inspection ● Supporting documents identified by USDA¹ 	<ul style="list-style-type: none"> ● Birth records (calving book, Red Book) ● Inventory records that reconcile ● Purchase and sales receipts ● Supporting documents identified by USDA¹

Country of Origin Label Declaration

Date: _____

Seller contact information

Name: _____

Address: _____

City and State: _____

Phone Number: _____

Number of animals: _____

General description: _____

Based on the documents in my possession these animals were born in _____ and
were raised in _____.

Signed: _____, Seller

The Iowa COOL Coalition representing the Iowa Farm Bureau, Iowa Cattlemens Association, Iowa Pork Producers Association, Iowa Department of Agriculture and Land Stewardship, and the Iowa Pork Industry Center and Iowa Beef Center at Iowa State University have prepared the above example affidavit for sellers to sign and present to buyers of cattle, hogs and sheep to establish an audit trail required by USDA as published in the October 30, 2004 Federal Register announcement of Mandatory Country of Origin Labeling.

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