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June 9, 2023

Docket Clerk  
U.S. Department of Agriculture  
Food Safety and Inspection Service  
1400 Independence Avenue SW  
Mailstop 3758  
Washington, DC 20250-3700

**Re: Docket No. FSIS 2022-0015**

To whom it may concern:

On behalf of the National Cattle Feeders' Association (NCFA), thank you for the opportunity to provide comments on the Food Safety and Inspection Service's (FSIS) Docket No. FSIS 2022-0015 on the Voluntary Labelling of FSIS-Regulated Products with U.S.-Origin Claims.

NCFA is the voice of Canada's cattle feeders. We work to improve the growth, sustainability and competitiveness of the beef sector in Canada. A key component to our success relies on a strong Canada-United States (U.S.) relationship between both our governments and our industries.

The beef industry is a highly integrated North American market. Significant numbers of live cattle move back and forth across the Canada/U.S. border every day – destined to a feedlot or to a processor. The sector on both sides of the border benefits from the seamless efficiencies of moving cattle based on economics, proximity and capacity.

NCFA is proud of Canada's trade success story with the U.S. but equally concerned about any interruption to the current momentum. We work closely with our industry counterparts in the U.S. to preserve an open market that contributes to food and economic security for both countries as well as a reliable and efficient supply chain – as per the goals of the United States-Mexico-Canada Agreement (USMCA).

As such, NCFA is very concerned that FSIS's proposed rule on US-Origin Claims undermines the positive trade momentum from which the Canada and the U.S. beef industries have been building.

Regardless of the voluntary nature of the proposed rule, NCFA is uneasy that the new rule will translate into a significant and negative market impact, similar to 2008 when mandatory country-of-origin labeling (COOL) was imposed on beef and pork.

As both Canada and U.S. beef producers struggle with high input costs and an unreliable global supply chain, our relationship becomes even more important. It is essential to have flexibility to move cattle across the border without additional rules that will force uneconomic production decisions for the sake of a marketing claim with limited impact for consumers.

By example, under this rule, a cow born, raised and processed in the U.S. (but which may have spent a small portion of its life at a Canadian feedlot) no longer qualifies for the 'Product of U.S.' label, which puts to question if the proposed rule is actually providing U.S. consumers with information that is meaningful or desired. And, according to the RTI survey commissioned by FSIS for this rulemaking, as few as 9% recalled seeing a plain text 'Product of U.S.' label declaration and value it less than other label declarations such as grass fed and free from antibiotics.

The rule also creates unnecessary discrimination at the consumer level against Canadian beef products which have been substantially processed in the U.S., given that most consumers would be unaware of the intricacies of beef production that qualifies for a 'Product of U.S.' label. Also, any implication that Canada's food safety standards are inferior to the U.S. standards is of concern.

Cattle feeders are the lynchpin in the beef value chain. Processors are our customers and we rely on their success for ours. As such, any additional costs due to rules and regulations that impact processors are also felt at the feedlot gate. For example, the U.S. is a large importer of beef trimmings from Canada, which are used to make sausages, burgers, patties, and ground meat products. Trimmings are often combined from several sources and it is our understanding that many processors cannot afford to source only American input for their products - thus the increased costs would be felt by farmers, retailers and consumers.

In border states, the interdependence between the U.S. processors and Canadian feedlots is even more significant. Processors rely on the inclusion of Canadian beef into their products and this proposed rule would force processors that pursue the 'Product of U.S.' label to ship beef in from longer distances instead of from their Canadian neighbors – resulting in both an economic and environmental impact.

A voluntary or mandatory labelling system can cause similar havoc on an integrated supply chain requiring segregation and traceability programs at each step of the value chain including feedlots and transport. This is costly, leading to inefficiencies and increased labour demands.

The current integrated system delivers a consistent, reliable and affordable supply to consumers while ensuring a profitable and competitive business for farmers on both sides of the border.

What the North American beef industry needs to focus on now is securing a resilient supply chain, investing in climate-smart agriculture, providing consumers with affordable food and delivering on food security.

In support of the Government of Canada's position, NCFA calls upon the USDA-FSIS to pause and reconsider the proposed rule in order to allow consultations between Canadian and U.S. officials to ensure more fulsome technical exchange on this issue and its implications.

Regardless of the voluntary nature or the proposed rule, it counters the momentum of the partnership that continues to grow between Canada and the U.S. beef industry. It is an unnecessary economic distraction.

NCFA will continue to work together with government and industry to find alternative ways to achieve the individual trade goals of our countries while maximizing the tremendous potential that lives in our trading partnership.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Tranberg". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Janice Tranberg  
President and CEO