

Preparing for Country of Origin Labeling

The USDA is preparing for Mandatory Country of Origin Labeling that begins September 30, 2008. The final MCOOL rules are not expected to be burdensome for producers to follow, but buyers may ask for more information that they have in the past.

While additional labeling categories exist, livestock producers will be mainly concerned with animals in two categories.

- Product of the US: born, raised, and slaughtered in the U.S. or animals that have been continuously in the U. S. since on or before July 15, 2008.
- Product of the United States, Country X, and/or (as applicable) Country Y where Country X and Country Y represent the actual or possible countries of foreign origin. For example, animals born in Canada and fed and slaughtered in the U.S.

In the case of beef, lamb, chicken, goat, and pork, a producer affidavit shall be considered acceptable evidence on which the slaughter facility may rely to initiate the origin claim, provided it is made by someone having first-hand knowledge of the origin of the animal(s) and identifies the animal(s) unique to the transaction. In addition, slaughter facilities that slaughter animals that are part of a National Animal Identification System (NAIS) compliant system or other recognized official identification system may also rely on the presence of an official ear tag and/or animal markings (i.e., “Can”, “M”), as applicable, on which to base their origin claims.

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

1. 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).
2. 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.
3. 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.
4. Sellers that sign the affidavit are responsible for maintaining adequate records to support country of origin claims if audited.

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, PigChamp, PigTales, etc) • Inventory records that reconcile • Purchase and sales receipts • Supporting documents identified by USDA¹

¹ Balance sheet, income statement, other financial records, Scale tickets and purchase and sales receipts, Closeout records and/or feed records or bills, Health papers, vaccination or other health treatment records or receipts, Shipping records, Farrowing, Calving, or Lambing records, Breed association registered pedigrees. See <http://www.ams.usda.gov/cool/records.htm> for details.

Country of Origin Label Declaration

Date: _____

Seller contact information

Name: _____

Address: _____

City and State: _____

Phone Number: _____

Number of animals: _____

General description: (i.e. color, sex of animal, tag #, ear notch, etc.)

Based on the documents in my possession these animals were born in _____
(i.e., United States)

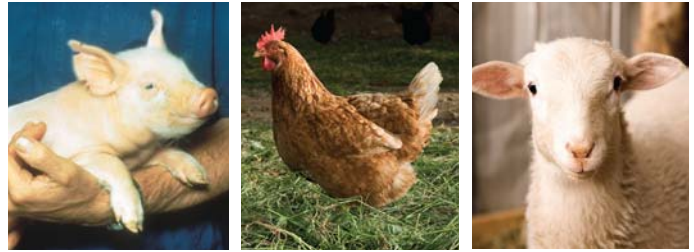
and were raised in _____.
(i.e., United States)

Signed: _____, Seller

The Iowa COOL Coalition representing the Iowa Farm Bureau, Iowa Cattlemen's 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.

COOL

Country of Origin Labeling



Information for County Extension Offices and 4-H Families

What is COOL?

The COOL (Country of Origin Labeling) law was put into effect for fish and shellfish on April 4, 2005. The final rule for all of the other covered commodities took effect on September 30, 2008.

This new requirement is not meant to be burdensome for producers to follow, but buyers of livestock projects (e.g., 4-H'ers or packers) will be asking for more information than they have in the past.

What Commodities Are Required?

Covered commodities included in this rulemaking are muscle cuts of beef (including veal), lamb, chicken, goat, and pork; ground meats including beef, lamb, chicken, goat, and pork; perishable agricultural commodities (fresh and frozen fruits and vegetables); macadamia nuts; pecans; ginseng; and peanuts. For 4-H'ers, this would include the following species: beef, meat goat, poultry, sheep, and swine, but also animals that may not be harvested until a much later time (for example, cull dairy cows or cull dairy goats).



Two Main Categories of Livestock

4-H animals will mainly fit into one of the following categories:

- Type A:** Product of the United States: born, raised, and harvested in the U.S. or animals that have been continuously in the U. S. since on or before July 15, 2008.
- Type B:** Product of the United States, Country X, and/or (as applicable) Country Y when Country X and Country Y represent the actual or possible countries of foreign origin. *For example, animals born in Canada and fed and harvested in the U.S.*

What 4-H'ers Need to Do

- **Ask for Documentation** – 4-H'ers need to make sure they collect documentation from the seller when purchasing livestock projects. Documentation could include the following:
 - Signed affidavit from seller of livestock (an example can be found at, <http://www.extension.iastate.edu/4H/Agriculture/index.htm>, under "Livestock ID") (see other examples in the table below)
- **Keep documentation for 2 years minimum** – 4-H'ers must keep the appropriate documentation for a minimum of two years in the case of a USDA audit.

Examples of Documentation to Keep for Two Years Minimum

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, PigChamp, PigTales, etc.) • Inventory records that reconcile • Purchase and sales receipts • Supporting documents identified by USDA¹

¹Balance sheet, income statement, other financial records, scale tickets and purchase and sales receipts, closeout records and/or feed records or bills, health papers, vaccination or other health treatment records or receipts, shipping records, farrowing, calving, or lambing records, breed association registered pedigrees.

What County Extension Offices Need To Do

County Fair

County Extension Offices are encouraged to have 4-H'ers sign the Animal Care and Disclosure Statement for their particular species at county weigh-ins or when 4-H'ers bring in ID forms. COOL verbiage has been added to each of these forms and they can be found at <http://www.extension.iastate.edu/4H/Agriculture/resources.htm>.

Counties will then need to provide either a specific affidavit from the packer/buyer who purchases their county fair animals or fill out the sample affidavit located at <http://www.extension.iastate.edu/4H/Agriculture/index.htm>, (under "Livestock ID").

If a USDA audit were to occur, counties would have sufficient documentation from both the 4-H'er and themselves to provide by keeping these documents for two years.

State Fair

All Iowa State Fair participants exhibiting the affected species of livestock will continue to fill out and sign the Animal Care and Disclosure Statements with the new COOL verbiage added.

The Iowa 4-H Office will maintain these statements for two years along with a signed packer affidavit when State Fair animals are harvested.



... and justice for all

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Frequently Asked Questions

Q. How are animals born on or before July 15, 2008 covered?

A. Animals that can be proven to be resident in the United States, regardless of original country of origin, on or before July 15, 2008, and remain in the U.S. are considered by rule to be from the U.S. For example, a 4-H'er purchased a breeding heifer in November 2007. The 4-H'er would need to keep current proof on record that this animal is still in the U.S. (e.g. calving report, vet records, etc.)

Q. What about breeding animals?

A. Breeding animals would also be required to have documentation from the seller on their origin. Breeding heifers, breeding sheep, and breeding swine all eventually go to harvest at some point in time even if not for several years. Appropriate documentation for cull dairy cattle would also be required.

Q. What about 4-H'ers raising their own animals?

A. 4-H'ers raising their own animals would need to keep the appropriate documentation (examples listed in the table on previous page).

Q. Is COOL different than Premise ID?

A. COOL is a completely separate program from Premise ID. COOL is mandatory, and Premise ID is optional, yet highly recommended.

For Additional Information

4-H Ag/Livestock website

<http://www.extension.iastate.edu/4H/Agriculture/index.htm>

Iowa Beef Center website

<http://www.iowabeefcenter.org/>

USDA website

<http://www.ams.usda.gov/cool/>

A special thanks to the Iowa COOL Coalition representing the Iowa Farm Bureau, Iowa Cattlemen Association, Iowa Pork Producers Association, Iowa Department of Agriculture and Land Stewardship, and the Iowa Pork Industry Center and Iowa Beef Center for their development of information and resources for this document.