

## 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](http://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.

<b>Buyers of livestock</b>	<b>Original producers of livestock</b>
<ul style="list-style-type: none"><li>• Signed affidavit from seller of livestock</li><li>• Bill of sale</li><li>• Health papers</li><li>• Brand inspection</li><li>• Supporting documents identified by USDA<sup>1</sup></li></ul>	<ul style="list-style-type: none"><li>• Birth records (calving book, PigChamp, PigTales, etc)</li><li>• Inventory records that reconcile</li><li>• Purchase and sales receipts</li><li>• Supporting documents identified by USDA<sup>1</sup></li></ul>

<sup>1</sup> 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.

# Packer

## Premise ID COOL Affidavits (Beef, Swine) Required?

Cargill Meat Solutions	Not at this time	4-H'er Form to fill out – see example
		County Fair Staff Form (only one form needed for all exhibitors) Form A - Born in U.S., Raised in U.S. Form B – Born in Canada (or other), Raised in U.S.
		*Note: Cargill is <u>NOT</u> accepting <u>any</u> Canadian born/raised pigs
Hormel	Yes (swine)	4-H'er Form to fill out - see example
JBS Swift	Not at this time	4-H'er Form to fill out - see example
Tyson Fresh Meats	Yes (swine only)	4-H'er Form to fill out - see example
		County Fair Staff Form (only one form needed for all exhibitors) Type A Form – Born in U.S., Raised in U.S. Type B Form – Born in Canada, Raised in U.S.

### Frequently Asked Questions about COOL

**Q. Does COOL pertain to both market and breeding animals?**

A. *If any animal will eventually go to a packer, even if it's a breeding animal 4 years down the road, that animal will need to have a documented paper trail (affidavit) in the case of an audit. The breeder/producer will need records of some sort (birth records, etc.) and the 4-H'er will need a signed affidavit from that breeder/producer as a paper trail in case of a USDA audit.*

**Q. What about animals that return home from the County Fair? Do they need a COOL affidavit?**

A. *Yes. The 4-H'er would need to have a signed affidavit from the seller on file at home.*

**Q. What does County Fair staff need to fill out and sign regarding COOL?**

A. *Look at your particular packer above. Some have a specific COOL affidavit form that the County Fair needs to fill out and sign and give to the packer. The packer affidavit should be mailed to your county office, so check with your local buyer. The County Fair staff representative only needs to fill out one form for all 4-H'ers. They would not need a packer COOL affidavit for every 4-H exhibitor. If the packer would get audited, they will show the form the county signed, and then the county would be able to show the specific form the 4-H'er has on file, and then the breeder/producer would show their documentation.*