Market Advisor

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COOL recordkeeping now necessary part of livestock marketing

The U.S. Department of Agriculture (USDA) issued an Interim Final Rule for the implementation of country-of-origin labeling (COOL) and was taking comments until Sept. 30. To view the rule or make or view comments, go to *www.ams.usda.gov/COOL*.

COOL for retail packages of beef, chicken, goat, lamb and pork became mandatory in the U.S. Sept. 30. Beef, lamb and pork were included in the 2002 Farm Bill. Chicken and goat meat were added in the 2008 Farm Bill.

COOL applies to meat retailers and packers who supply meat to consumers. The rule does not apply specifically to livestock, but since retailers must maintain records that document the origin of meat products, livestock producers will be expected to provide country-of-origin documentation whenever livestock are sold.

A means to verify

On Aug. 26, a broad-based group of livestock and meat organizations developed several affidavit/declaration statements that can be used to verify the origin of animals as they move from farms and ranches through various production and marketing channels. The affidavits were presented by the industry groups to the USDA Sept. 5. A printable version is available at *www.beefusa.org/uDocs/countryoforiginaffidavit453.pdf*.

It is expected that these affidavits will receive widespread use in livestock marketing channels. However, producers should be aware that individual retailers, packers or markets may require paperwork specific to their business.

Livestock producers are urged to contact the market where they plan to sell livestock several weeks in advance to see what paperwork may be required.

Documentation

Producers will also need to keep records that document the country-of-origin of livestock that they are selling. Language in the Farm Bill states that "records maintained in the normal conduct of business" are sufficient. Records, such as calving, farrowing or lambing books; sales receipts; health records; or purchase affidavits should be kept for at least one year after the livestock are sold. See the previously mentioned USDA web site for specific examples of records that may apply.

Producers who participate in the National Animal Identification System (NAIS) are considered to have sufficient documentation of an animal's origin. However, the Farm Bill prohibits the USDA from requiring mandatory participation in NAIS for COOL compliance.

In addition, USDA verification programs, such as the USDA Process Verified Program (PVP) and the Quality Systems Assessment (QSA) program, that contain a source verification component also are considered acceptable for COOL compliance. The American Angus Association's AngusSource® program is a PVP.

Grandfathered in

The interim rule states that all livestock present in the U.S. on or before July 15, 2008, and once present in the U.S. and remain continuously in the U.S., are considered of U.S. origin. Therefore, it is suggested that producers keep an inventory record of all animals in their possession on July 15.

Producers also should request a signed affidavit for all livestock that they purchase, even if it is only one breeding bull, for example.

Backgrounders and feedlots that commingle animals from multiple sources into larger lots that have the same origin, such as the U.S., may issue a single affidavit when the animals are sold. Of course, the appropriate records from the multiple sources must be kept.

Marketing livestock with accompanying records that satisfy COOL compliance is new to all livestock and meat marketing channels, so patience will be necessary during the next few months as details are finalized.

Editor's Note: *For more information about COOL and how you can comply, visit* www.countryoforiginlabeling.info. *This site is provided by Angus Productions Inc. (API) as an online portal to information available online from various sources, regardless of support or opposition to the COOL concept.*