

COOL is Back ... Again

Now that the Farm Bill process is finally over, cattle producers should be ready for the long-delayed implementation of country-of-origin labeling (sometimes referred to as COOL or COL). The new Farm Bill has some language that modifies the previous country-of-origin labeling legislation and that has a couple of implications for producers.

First, the new language simplifies the meat labels and the records requirements for country-of-origin labeling. This should make it easier for some producers to meet requirements, although the legislation applies to the requirements for meat retailers and it will be up to them to decide exactly what records to request from packers, feedlots, stocker and cow-calf producers.

The second implication is that the legislative changes mean that the Agricultural Marketing Service (AMS) must change the implementation rules to conform to the new language. This means that the final rules are not yet spelled out and there is some uncertainty about the dates of implementation. It is anticipated that AMS will move quickly to implement interim rules while going through the process of finalizing the rules.

The new language emphasizes the use of existing business records whenever possible to minimize the burden on producers. For many cow-calf producers, existing business records are likely sufficient and producers may simply have to offer an affidavit that they have the records to document the origin of the calves they sell.

Documenting cull breeding animals could be problematic, and producers should give some thought to keeping records for later years when cull animals are sold. Current animals will likely be grandfathered in as of a date to be determined.

For many stocker producers, country-of-origin labeling may require some new recordkeeping efforts. Producers will likely need to request affidavits of origin for cattle they buy and maintain records sufficient to link those buying groups to commingled and sorted selling groups. It is not necessarily the case that producers must use individual animal identification (ID) to meet country-of-origin labeling requirements.

It may be possible to verify multiple purchase groups of animals that all have the same origin (i.e. born and raised in the USA) that are subsequently sorted and commingled into different selling groups but can be shown to all be covered by the same label, for which the stocker producer can offer an affidavit as seller.

In other cases, it may well be that the easiest and least costly way for the stocker producer to meet country-of-origin labeling requirements is to use individual animal ID to track animals through the stocker operation.

Producers should watch for additional information as the details are finalized in the coming weeks and months.

— *by Derrell Peel, Oklahoma State University Extension livestock marketing specialist*

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