



National Milk Producers Federation

National Milk Producers Federation • 2101 Wilson Blvd., Arlington, VA 22201 • 703-243-6111; FAX 703-841-9328

Agri-Mark, Inc.
Arkansas Dairy Cooperative Association
Associated Milk Producers, Inc.
Continental Dairy Products, Inc.
Cooperative Milk Producers Assn.
Dairy Farmers of America, Inc.
Dairymen's Marketing Cooperative, Inc.
Dairylea Cooperative Inc.
Ellsworth Cooperative Creamery
Farmers Cooperative Creamery
First District Association
Foremost Farms USA
Humboldt Creamery
Just Jersey Cooperative, Inc.
Land O'Lakes, Inc.
Lone Star Milk Producers, Inc.
Manitowoc Milk Producers Coop.
MD & VA Milk Producers Cooperative Association, Inc.
Michigan Milk Producers Assn.
Mid-West Dairymen's Company
Northwest Dairy Association
Prairie Farms Dairy, Inc.
St. Albans Cooperative Creamery, Inc.
Scioto County Co-op Milk Producers' Assn.
Select Milk Producers, Inc.
Southeast Milk, Inc.
Swiss Valley Farms, Co.
Tillamook County Creamery Assn.
United Dairymen of Arizona
Upstate Niagara Cooperative, Inc.
Zia Milk Producers

Docket No. AMS-LS-07-0081
Country of Origin Labeling Program, Room 2607-S
USDA-AMS, STOP 0254
1400 Independence Avenue, SW.
Washington, DC 20250-0254

Re: Mandatory Country of Origin Labeling of Beef, Pork, Lamb, Chicken, Goat Meat, Perishable Agricultural Commodities, Peanuts, Pecans, Ginseng, and Macadamia Nuts; Docket No. AMS-LS-07-0081

September 29, 2008

To whom it may concern:

The National Milk Producers Federation appreciates the opportunity to provide comment on the United States Department of Agriculture (USDA) Agricultural Marketing Service (AMS) interim final rule on Mandatory Country of Origin Labeling of Beef, Pork, Lamb, Chicken, Goat Meat, Perishable Agricultural Commodities, Peanuts, Pecans, Ginseng, and Macadamia Nuts (Docket No. AMS-LS-07-0081). The National Milk Producers Federation (NMPF), based in Arlington, VA, develops and carries out policies that advance the well being of dairy producers and the cooperatives they own. The members of NMPF's 31 cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of more than 40,000 dairy producers on Capitol Hill and with government agencies.

America's dairy producers market nearly 3 million dairy animals to slaughter each year in the United States. Additionally, dairy producers are the primary source for youngstock raised in the veal industry. Because of these marketings, Country of Origin Labeling (COOL) is of great interest to NMPF members. The 2002 and 2008 Farm Bills amended the Agricultural Marketing Act of 1946 to require retailers to notify their customers of the country of origin of beef (including veal), lamb, pork, chicken, goat, wild and farm raised fish and shellfish, perishable agricultural commodities, peanuts, pecans, ginseng, and macadamia nuts. We note that COOL does not pertain to milk and milk products and NMPF does not desire to extend any COOL regulations to milk and milk products.

While retailers are required to ensure compliance, retailers will seek through their supply chain verification of country of origin of animals that are subject to COOL. This will necessitate maintenance of records from the producer through the retailer for such

Jerry Kozak, President/Chief Executive Officer

Charles Beckendorf, Chairman

www.nmpf.org

verification. NMPF supports the Universal Country of Origin Affidavit/Declaration that was developed by consensus across the livestock and poultry industry to serve as the necessary verification from producers to slaughter facilities for the country of origin of livestock. The Universal Country of Origin Affidavit/Declaration is backed by records from the farm through auction markets to the slaughter facilities. Slaughter facilities then continue the verification process through to retailers.

NMPF also supports, as an alternative to the Universal Country of Origin Affidavit/Declaration, the use of the National Animal Identification System (NAIS). Official USDA 840-tags can serve as a universal passport for a dairy animal during its lifetime indicating the animal is of U.S. origin no matter how many times ownership of the animal changes during its lifetime. NMPF strongly encourages USDA to utilize RFID tags in the NAIS to allow verification of country of origin at the speed of commerce. Official NAIS USDA 840-RFID tags for dairy cattle represent the simplest way for dairy producers to assist in the marketing of their cattle to ensure compliance with COOL.

We appreciate the opportunity to provide these comments and fully support these proposed regulatory changes. Please contact me if you have any questions about these comments.

Sincerely,

A handwritten signature in purple ink that reads "Jamie S. Jonker". The signature is written in a cursive style with a large initial "J".

Jamie S. Jonker
Director, Regulatory Affairs

Enc.