

COOL Recordkeeping Requirements for Cattle Producers Becoming Clearer

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As the Sept. 30 deadline for implementation of country-of-origin labeling (COOL) approaches, industry participants are working hard to clarify details with USDA's Agricultural Marketing Service (AMS) and to agree on language that is acceptable to all parties. Recently, the result of a broad-based industry coalition to develop language for affidavits was announced and portions of these announcements are included in the following information. The language includes three affidavit or declaration statements that provide required information on animals as they move through production and marketing channels.

You can download this printable affidavit from the National Cattlemen's Beef Association (NCBA) web site by clicking on the following url: www.beefusa.org/uDocs/countryoforiginaffidavit453.pdf. This may require downloading of a free software "Adobe Reader". Most newer computers already have this software in place.

The first is a continuous country-of-origin affidavit/declaration. This will allow producers to make a continuous origin affidavit that would be kept on file by the market, stocker, feeder or slaughter plant, until revoked by the affidavit's signer.

Part two is a supporting declaration of origin for specific transactions involving livestock from producers with a continuous affidavit on file, or as a "stand alone" affidavit/declaration related to a specific transaction. This language could be used on check-in sheets, invoices and/or other sales documents.

The third statement covers direct transactions to packers from producers, marketing businesses and feeders. The COOL law requires packers to maintain country-of-origin records for one year, and they must be able to obtain records from their immediate suppliers within that period, to substantiate COOL claims. This statement says the livestock supplier will maintain those records for one year from date of delivery of the livestock, and will make them available, as required by the COOL law.

These universal declaration statements go a long way to minimizing the costs of COOL implementation for livestock producers. However, producers still need to maintain records that will verify declarations made in affidavits in the event that such records are requested.

Another important clarification, especially for stocker producers as well as some feedlots, is AMS' approval to use consolidated affidavits for commingled and resorted lots of animals. In this situation, a producer with multiple sources of animals of the same origin, may issue a single consolidated affidavit of origin for commingled sales groups, based on the set of individual affidavits of the purchase groups. Again, the producer must maintain records that verify the balance of total purchases and sales to document the overall flow of animals through the operation

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