

Q & A on COOL

What is Country of Origin Labeling?

Country of Origin Labeling (COOL) is a mandatory program to disclose country of origin of certain “covered products”. COOL was first passed by Congress in 2002, as an amendment to the Farm Bill. That provision required covered products to be labeled with a country of origin label by Sept. 30, 2004. Later that year, implementation for COOL for all products except for fish and shellfish was delayed to Sept. 30, 2006.

Senator Burns is a long-standing supporter of mandatory COOL. In fact, he introduced a bill to require Country of Origin Labeling as far back as 1999, and supported adding COOL to the Farm Bill.

What products are covered under the law?

Covered products include:

- muscle cuts of beef (including veal), lamb, and pork;
- ground beef (including veal), ground lamb, and ground pork;
- farm-raised fish (including shellfish);
- wild fish (including shellfish);
- a perishable agricultural commodity; and
- peanuts.

What's not included: Any processed food. This means anything that has been cooked, cured, substantially modified, or had other food products added to it. For example, neither canned fish, smoked salmon, or marinated fish filets are included.

This exemption, plus the exemption for food service establishments (below), means that **less than half** of the beef in the U.S. will be labeled.

Who is covered by the law?

The law states that anyone engaged in the business of supplying a covered commodity to a retailer shall provide information to the retailer indicating the country of origin of the covered commodity. This means producers, packers, intermediate distributors, and importers.

Specifically **excluded** from COOL requirements are food service establishments – restaurants, cafeterias, bars, or similar facilities that sell covered commodities to the public. The rules for fish also note that fish markets don't meet the definition of retailer, so they are excluded.

What does it mean to be a product of U.S. origin?

According to the law, products of U.S. origin must be born, raised and slaughtered in the United States to bear a “product of U.S. origin” label.

If a product contains ingredients of mixed origin, all countries must be listed – for instance, a package of ground beef that contains beef from the U.S., Canada, and Mexico would need a label listing all three countries.

I am a small cow/calf producer in Montana. What is expected of me?

At this time, it is not really clear what is expected of producers. It is likely that producers need a system that can track the immediate previous source and immediate subsequent recipient of covered commodities for 1 year. Whether that system will be an elaborate computer database or a handwritten journal appears to be up to individual producers.

USDA is not likely to specify a particular tracking system, and is prohibited by law from using a mandatory Animal ID system to identify country of origin. However, USDA has provided some guidance as to possible recordkeeping systems that could be used at: www.ams.usda.gov/COOL/records.htm

As a consumer, what will I see in the grocery store?

The law states that retailers may display country of origin “by means of a label, stamp, mark, placard, or other clear and visible sign on the covered commodity or on the package, display, holding unit, or bin containing the commodity”.

Are Country-of-Origin Labeling and Animal ID the same thing?

No. Animal ID is designed to address animal health, while COOL is a marketing tool. USDA is prohibited from using a mandatory ID program to verify origin.

However, individual producers may benefit from having an animal ID system in place for internal tracking purposes. Producers may *choose*, for their own business reasons, to use ear tags or brand inspection records to document country of origin.

What is the status of COOL now?

USDA has issued rules on COOL for fish and shellfish – those rules will be effective on April 4, 2005. COOL requirements for the remaining commodities become effective on Sept. 30, 2006.