



R-CALF USA

PO Box 30715

Billings, MT 59107

Phone: 406-252-2516

Fax: 406-252-3176

Email: r-calfusa@r-calfusa.com

www.r-calfusa.com

November 15, 2021

The Honorable Tom Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

TRANSMITTED ELECTRONICALLY

Dear Secretary Vilsack:

R-CALF USA joins in the National Cattlemen's Beef Association's (NCBA's) November 12, 2021, request to you to immediately suspend all imports of fresh beef from Brazil to the United States.

We agree with the NCBA that such an immediate suspension is warranted given the delayed reporting by Brazil of outbreaks of bovine spongiform encephalopathy (BSE or mad cow disease) in Brazil's cattle herd. We also agree that the requested suspension should remain in effect until the United States conducts a thorough assessment of Brazil's compliance with and capacity for timely detecting diseases and other threats to consumers, including a probing review of Brazil's veterinary diagnostic laboratory system.

However, due to Brazil's repeated delays in disclosing reportable outbreaks of BSE in particular, R-CALF USA's request for suspension is more expansive. The United States should immediately suspend all imports of *all* beef products from Brazil, both fresh and pre-cooked, pending the completion of the requested reviews. This expanded request is based on our knowledge that the BSE prion is not inactivated by conventional beef-related heat processes. Therefore, and because our request is chiefly driven by Brazil's repeated failures to timely report BSE outbreaks, all imports of *all* beef potentially subject to BSE contamination must be suspended.

We first expressed our concern regarding Brazil's failure to timely report BSE outbreaks in our December 10, 2012, letter to you. In that letter, as here, we requested a suspension of all imports of all Brazilian beef products, and the 2012 letter additionally included a request for suspension of any imports of cattle from Brazil. As indicated by the NCBA's letter to you, and confirmed by us, Brazil continued to delay its reporting of BSE cases in 2014, 2019, and now in 2021.

What Brazil's trail of reporting violations reveals is that government-led sanctions have proven inadequate to ensure Brazil's ongoing compliance with food safety protocols demanded by U.S. consumers. Your support of the recently introduced mandatory country of origin labeling bill (S.2716), and its subsequent congressional enactment, would add a new and more effective enforcement mechanism – a market-based mechanism – to ensure compliance. Empowering consumers to choose if they wish to purchase products from countries such as Brazil that attempt to circumvent U.S. food safety expectations will only be possible when S.2716 is enacted. And through their buying

preferences, consumers can help ensure compliance to their food safety expectations, or exact compliance with efforts to end other unfavorable production practices, such as the deforestation of the world's rain forests.

For the reasons stated above, we urge you to immediately suspend all imports of *all* beef from Brazil to the United States until such time as your agency determines, through a thorough and probing investigation, that Brazil is in full compliance with all U.S. food safety standards and has the capacity to remain in compliance without day-to-day United States' oversight.

In addition, we urge you to assist Congress in enacting S.2716, the bill requiring mandatory country of origin labeling (MCOOL) for beef that will empower consumers to exercise a market-based approach to ensuring that foreign beef is produced under the same high standards as required in the United States and expected by United States consumers.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Bullard", written in a cursive style.

Bill Bullard, CEO