

Iowa COOL Proposal: Striving for Middle Ground

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Observations

- **Rock and a hard place**
 - Final rules not written
 - Current voluntary rules based on existing programs that have higher standards than an address

Range of Possibilities

- **Presumed US**
 - Identify imports and assume that anything without markings is US
 - Producers exempt from records
 - Packers responsible for identifying, segregating, and labeling

Range of Possibilities

- **Packers requesting 3rd party verification and affidavits**
 - Not in the law or USDA rules
 - Not defined
 - Difficult to complete in time frame
- **GIPSA indicates that it is within buyers right to request if all sellers are treated the same.**

Middle Ground???

- **Accountability**
 - Producers and others
 - Audit the process
- **Practicality**
 - Leave an audit trail with signatures
 - Minimize the cost

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- **Work with USDA**
- **Recommendations for producers**
 - Safe
 - Practical
 - Start the education
 - Minimum requirements

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Coalition proposal

Iowa Farm Bureau
Iowa Pork Producers Association
Iowa Cattlemens Association
Iowa Dept Ag
Iowa State University

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- **Foundation**
 - Have an auditable trail
 - Group ID by origin
 - Transfer ownership with signature
- **Audit the process not the product**

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Auditable trail

- **Based on existing records at the sellers premise**
- **Reconcilable records**
- **Can produce if audited**
- **Seller may request copies**

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- **Group ID by origin**
 - Identify those of different origin
 - Maintain movement records
 - Develop and follow SOP
- **Accepted for hogs**
- **USDA wants cattle ID to source**

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- **Transfer ownership with signature**
 - *I have documentation to back claims*
 - May add to bill of sale or health papers
- **Auction markets may transfer signature or record and sign**
 - Link with seller number or name
 - Special sales

Example Cattle Records

- **Beginning inventory**
- **Additions (births, inshipments*, purchases*, leased*, or customer cattle*)**
- **Removals (sales, deaths, outshipments)**
- **Ending inventory**

*Additions from other sites must have adequate documentation of origin

Supporting Documents

- **Balance sheet, income statement, other financial records**
- **Scale tickets and purchase / sales receipts**
- **Closeout records, feed records or bills**
- **Health papers, vaccination or other health treatment records or receipts**
- **Shipping records**
- **Calving books**

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- **Low cost if producers are exempt**
- **Necessary information if documentation is required**
- **Practicality and accountability**
- **Minimum recommendation**
 - **May wish to consider individual ID and organized database**

Next Steps

- **Hurry up and wait!!!**
 - **Comment to shape final rule**
 - **Communicate with congress**
- **Be prepared for either outcome**
 - **Can't have the complex without the simple**
 - **Consider added precautions**
 - **EID, Green Tag**