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December 28, 2004

The Honorable Ann Veneman  
Secretary  
United States Department of Agriculture  
Washington, DC 20250

Dear Madam Secretary:

We appreciate the announcement by you and senior officials of the Department today that a long-awaited Final Rule to permit trade in ruminant livestock with Canada will be published in the *Federal Register* next week.

The purpose of this letter is to draw your attention and request immediate action to a serious inequity that is built into this Final Rule and that requires immediate attention, and hopefully supplementary immediate action by your Department.

Enclosed is a copy of our letter to you dated August 14, 2004, which specifically focuses on the extreme inequity that would arise if the Department, in its Final Rule, distinguished between importing livestock over 30 months of age from meat and meat products from this same class of livestock. There is no scientific justification to deny one and allow the other. This inequity has not been addressed in the Final Rule that is posted to the USDA's website today.

Unless it rectifies this inequity, the Department will outsource the U.S. cow slaughter industry to Canada. This is an industry that employs many thousands of hard-working men and women, and has invested \$millions in infrastructure. It has been strongly supportive of the Department's efforts to implement BSE mitigation efforts, including bearing the greatest burden of the surveillance program. It should not now be asked to stand by and watch its own government establish a gross inequity by allowing the importation of meat from Canadian cattle over 30 months in age, but not permitting the importation of these same cattle for direct slaughter in the United States. U.S. packers should not be precluded by regulations issued by their own government that deny them the ability to compete on a level playing field with meat from over 30 month animals slaughtered in Canada and imported into the U.S.

We urge you to initiate appropriate technical correction to the Final Rule immediately.

We thank you for your consideration.

Sincerely,

Rosemary Mucklow  
Executive Director

Cc: Under Secretary Bill Hawks  
Encl. August 14, 2004 letter to Secretary Veneman