

June 21, 2018

United States Roundtable for Sustainable Beef  
Sustainability Assessment Guides  
Framework Overview

**Re: United States Roundtable for Sustainable Beef Sustainability  
Framework: Sustainability Assessment Guides Public Comment**

To Whom It May Concern:

The North American Meat Institute (NAMI or the Meat Institute) submits these comments concerning the above-referenced Sustainability Assessment Guides (SAGs, guidance, or documents) created by the United States Roundtable for Sustainable Beef (USRSB or the Roundtable). The Meat Institute has a rich, century-long history and provides essential member services including legislative, regulatory, scientific, international, and public affairs representation for the meat and poultry packing and processing industries. Together, NAMI members produce the vast majority of U.S. beef, pork, lamb, and poultry products in the United States. Below, please find comments regarding the overall readability and consistency of the documents, followed by sector-specific comments.

The Meat Institute applauds the Roundtable's working groups for the time and labor committed to developing these documents. Collaboration among beef producers, packers/processors, and retailers is key to the industry's sustainability. The SAGs capture many of the key components needed to assess sustainability of each sector and will foster continuous improvement in the implementation of the metrics outlined by the USRSB. However, there is room for improvement in the organization and consistency of the documents. NAMI suggested changes are provided below.

**General Comments**

For example, other than the Retail and Food Services Sector Guide, all SAGs include a brief overview of that particular sector of the industry. For consistency, and to inform those unfamiliar with the Retail Sector, an overview should be included. Consider taking the existing text in the first two paragraphs, combining it with the text in the "Diverse Business Models" section, and labeling the resulting paragraphs "Overview of the Retail and Food Services Sector."

Likewise, the metrics should be listed in the same order in each document. In the Cow/Calf Sector SAG, the first metric listed is Animal Health and Well-Being. In the Feedyard Sector SAG, the first metric discussed is Water Resources. It is preferable to decide the metrics' order and remain consistent throughout the documents.

Additionally, each document's format is different. The Cow/Calf and Packer/Processor Guides documents are formatted in text only. In contrast, much of the text in the Feedyard, Packer/Processor, and Retail/Food Service Guides is contained (at times) in table-like format, which diminishes the consistency and professionalism of the documents.

More consistency can be achieved by combining all reference sections into one at the end of each document. That change will eliminate confusion by making the documents shorter and easier to read. Although the sections on each metric should have their own set of references pertaining to that specific metric, there is no need for reference sections throughout the document. Producers, packers, and retailers should be able to focus on the guidance within the documents, rather than riffling through references they may not use. Organizing the references into one section at the end of each document, separated by the metric to which they pertain, should suffice.

Finally, the concept of "levels" of sustainability efforts is not introduced until the Packer/Processor Sector Guidance. Aside from the inconsistency, the concept is confusing and redundant. In the live animal SAGs, no levels exist, but there are a number of recommended practices under each metric. Rather than rank each production unit, whether cow/calf, feedyard, packer, or retailer, the guides should highlight the recommended practices and let the production unit managers decide whether they fall within those stipulations. The practice of improving sustainability is not a game or competition in which levels are reached and boxes are checked. Rather, it is a journey that all production units should take following the guidance outlined in the SAGs.

### **Sector-specific Comments**

#### *Cow/Calf Sector:*

- Line 153, Antimicrobial Use: This section does not include an important aspect of antimicrobial use in the food animal industry: a valid Veterinary-Client-Patient Relationship (VCPR). This relationship is the most important part of using antimicrobials for cattle health. The judicious use of antimicrobials starts with establishing such a relationship.

- Line 188, Antimicrobial Use practices: Number 14 should read “Sub-therapeutic antibiotic use is discouraged, and is illegal if using in-feed antimicrobials.”
- Line 938, Employee Safety and Well-Being Guidance to Achieve the Metric: Number 4 should recommend documenting participation in trainings.
- Line 940, Additional Guidance in the Employee Safety and Well-Being section: This section should include a statement encouraging owners and managers to become familiar with the regulations enforced by the Occupational Safety and Health Administration (OSHA). Some OSHA regulations may apply to their operation and employees.

*Auction Market Sector:*

- No specific comments regarding this guidance.

*Feedyard Sector:*

- Line 24, Table 1 in the Industry Overview section: The data shown here is very interesting; however, if the working groups choose to show this data, it should be shown for all sectors, not just the feedyard sector.
- Line 113, Water Resources Metric section: The “Continuous Improvement Strategy” sections in the metrics sections are redundant and not consistent with other guidance documents. A better place for this information is at the beginning of the document, as in the Cow/Calf Guidance.
- Line 432, Antimicrobial Use section: This section should also include the recommendation of a valid Veterinary-Client-Patient Relationship (VCPR), and the last bullet should read “Sub-therapeutic antibiotic use is discouraged, and is illegal if using in-feed antimicrobials.”
- Line 512, Employee Safety and Well-Being, Guidance to Achieve the Metric: This section should also include a statement that encourages owners/managers to become familiar with the regulations enforced by the Occupational Safety and Health Administration (OSHA).

*Packer & Processor Sector:*

Generally, the document covers the metrics established. However, it lacks opportunities for packers to state *what* they are doing to improve sustainability.

There are many “yes” or “no” questions or questions asking for a specific number (for example water, CO<sub>2</sub>), but there is no avenue to provide context. Perhaps a list of “Best Practices” could be provided so packers and processors can indicate which, if any, of those practices they are following. Additionally, the Packer & Processor Guidance uses the terms “facility” and “company” interchangeably when they are two different entities. Streamlining this language or defining the terms would provide proper context. Finally, the following bullets provide more specific recommendations.

- Line 24, Figure 1 in Overview section: This line should read “Percentage of fed beef slaughter by major packing companies in the United States.”
- Lines 127-128, Water Resources Metric section: This sentence states packers and processors should publicly disclose their water quality and use performance. This recommendation is only made in the Packer & Processor sections. For consistency and transparency throughout the industry, all sectors should be asked to publicly report water quality and use performance, or none should report the information. Although providing this information may be more difficult for cow/calf producers, feedyards may, and retailers likely will have this information available, and should publicly disclose it if the request is being made of packers and processors.
- Line 140, Efficiency and Yield Metric section: The only metric referred to in this section pertains to waste. In other documents, such as the Cow/Calf and the Feedyard Guidances, the “Yield” portion is emphasized. A similar yield metric should be used in the Packer & Processor Guide. Waste is inherently “bad” and efficiency and yield are inherently “good.” A yield or efficiency metric such as carcass utilization could help demonstrate the efficiency of the Packer & Processor Sector.
- Line 261, Air and Greenhouse Gas Emissions Metric section: Add commas after “69.9 percent of animals,” “81.4 percent of feedstuffs,” and “87.9 percent of the water.”
- Line 309, Air and Greenhouse Gas Emissions Metric section: This sentence states packers and processors should publicly disclose their CO<sub>2</sub> emissions. Again, this recommendation is only made in the Packer & Processor sections. For consistency and transparency throughout the industry, all sectors should be asked to report air and gas emissions, or none should report the information. Again, this may be difficult for cow/calf producers, but feedyards and retailers may have this information available.
- Line 349, Land Resources Metric section: Some of the text appears to be missing in this section.

- Lines 398-409, Description of Animal Health and Well-Being Indicator: This information about transportation of livestock and mitigation practices in extreme weather should be included in all other sectors because all sectors of the beef industry deal with transportation and weather extremes.
- Lines 413-16, Description of Animal Health and Well-Being Indicator: The statement should read “Meat packing companies should follow humane methods of slaughter, which are enforced by the USDA Food Safety and Inspection Service (FSIS). These methods were passed in the Humane Slaughter Act of 1978.”
- Lines 448-49, Animal Health and Well-Being Metric section: The question should read “Does the company use 2<sup>nd</sup> or 3<sup>rd</sup> party animal welfare audits, such as the North American Meat Institute’s Animal Handling Guidelines to verify compliance with its policy at least to the packer level?” Beef Quality Assurance certification does not focus verification of animal health and well-being at the packer level.
- Line 457, Animal Health and Well-Being Metric section: This section uses for the first time the acronym NAMI so the sentence should spell out North American Meat Institute (NAMI) here.
- Line 530, Employee Safety and Well-Being section: Rather than “...still opportunity for improvement,” the statement should read “...always opportunity for improvement.”
- Line 547, Employee Safety and Well-Being Metric section: As with NAMI, please define “EEOC” because it is the first time the organization is mentioned in the document.

#### *Retail & Food Services Sector:*

The Retail & Food Services Sector SAG is vastly different from the other SAG documents. It provides too much information in a disorganized format, inconsistent with the other SAGs. Including case studies is not necessary, and providing a description of each resource provided is confusing and unnecessary. The Meat Institute also encourages reviewing the resources provided because it appears some could introduce biased information to readers. Additionally, resources/references are not cited consistently within this document compared to other guidance or documents. Finally, the following bullets provide more specific recommendations.

- Line 24, Retail/Food Service Metric Development: Add “to” between “looking” and “take.”

- Line 217, Water Resources Metric, Critical Definitions: These terms should be defined in the text or before the text, *i.e.* “water risk” is not a common term. The text is hard to understand without defined terms.
- Line 689, Land Resources Metric: Where does the “Foundational Commitment” come from? Although the concept is good, it may fit better in an Overview section.
- Line 697, Land Resources Metric, Primary Assessment Questions: The Level 3 question is not a metric listed in the metric report. Again, the Meat Institute recommends doing away with the concept of “levels” of sustainability.
- Line 705, Land Resources Metric, Scope: This concept of “scope” is not discussed in any other guidance, nor is it mentioned elsewhere in the current document. Also, this guidance is for the United States Roundtable. International issues should be kept in documents created by the Global Roundtable for Sustainable Beef.
- Line 715, Land Resources Metric, Supporting Assessment Criteria: Is this criteria necessary for the United States Roundtable for Sustainable Beef? Again, it should be left to the Global Roundtable.
- Line 982, Animal Health and Well-Being Metric, Level 2, Supporting Assessment Criteria: Packer audits are not based on Beef Quality Assurance concepts. If packers are the focus of these required retail audits, NAMI auditing guidelines are the standards that should be recommended.
- Line 1016, Animal Health and Well-Being Metric, Level 3, Supporting Assessment Criteria: The concept of animal disease traceability should not be broached in a document dedicated to the Retail and Food Service Sector.
- Line 1126, Employee Safety and Well-Being Metric, Level 2: Primary Assessment Question: Why is the retailer asking whether packers are compliant with employee safety and well-being efforts? Retail and Food Service entities should address the code of conduct within their facilities and not police the Packer & Processor, Feedyard, and Cow/Calf Sectors. The SAGs for all other sectors address employee safety and well-being, which should suffice for the Retail & Food Services Sector.

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Sustainability in the United States beef industry is a complex issue. Although not an easy task, it is USRSB's responsibility to provide simple and consistent best practice recommendations in a consistent and professional format.

The Meat Institute appreciates the opportunity to provide these comments. Please contact me if you have questions about these comments or anything else regarding this matter. Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tiffany Lee". The signature is fluid and cursive, with the first name being more prominent.

Tiffany Lee, DVM, PhD  
Director, Regulatory and Scientific Affairs  
North American Meat Institute

cc: Barry Carpenter  
Mark Dopp