



United States Department of Agriculture  
Office of the Chief Economist  
Room 112-A J.L. Whitten Building  
1400 Independence Avenue, SW  
Washington, D.C. 20250-3810

JUN 4 2015

Mr. Bill Bullard  
R-CALF United Stockgrowers of America  
P.O. Box 30715  
Billings, Montana 59107

Dear Mr. Bullard:

Thank you for your interest in USDA's recent report to Congress entitled, "Economic Analysis of Country of Origin Labeling (COOL)," which was submitted to Congress on May 1, 2015, to address the following section of the Agricultural Act of 2014:

SEC. 12104. COUNTRY OF ORIGIN LABELING.

(a) ECONOMIC ANALYSIS.—

(1) IN GENERAL.—Not later than 180 days after the date of the enactment of this Act, the Secretary of Agriculture, acting through the Office of the Chief Economist, shall conduct an economic analysis of the final rule entitled "Mandatory Country of Origin Labeling of Beef, Pork, Lamb, Chicken, Goat Meat, Wild and Farm-raised Fish and Shellfish, Perishable Agricultural Commodities, Peanuts, Pecans, Ginseng and Macadamia Nuts" published by the Department of Agriculture on May 24, 2013

(78 Fed. Reg. 31367) that makes certain amendments to parts 60 and 65 of title 7, Code of Federal Regulations.

(2) CONTENTS.—The economic analysis described in subsection (a) shall include, with respect to the labeling of beef, pork, and chicken, an analysis of the impact on consumers, producers, and packers in the United States of—

(A) the implementation of subtitle D of the Agricultural Marketing Act of 1946 (7 U.S.C. 1638 et seq.); and

(B) the final rule referred to in subsection (a).

The Office of the Chief Economist (OCE) solicited an economic analysis by an independent group of expert consultants and then compared and contrasted that economic analysis to the economic analysis conducted for the 2009 COOL rulemaking by USDA and the economic analysis conducted for the 2013 COOL rulemaking by USDA. Those three economic analyses utilized different methodologies to estimate the economic impacts of country-of-origin labeling requirements on consumers, producers, processors, and retailers of beef, pork and chicken.

Your May 14, 2015, letter states that you are requesting a correction of information for that report based on USDA's information quality guidelines. The following information quality criteria comprise the general quality standards that USDA agencies and offices follow in developing and reviewing information and disseminating it to the public.

### **Objectivity**

- USDA agencies and offices will strive to ensure that the information they disseminate is substantively accurate, reliable, and unbiased and presented in an accurate, clear, complete, and unbiased manner.
- To the extent possible, consistent with confidentiality protections, USDA agencies and offices will identify the source of the information so that the public can assess whether the information is objective.

### **Utility**

- USDA agencies and offices will assess the usefulness of the information they disseminate to its intended users, including the public.
- When transparency of information is relevant for assessing the information's usefulness from the public's perspective, USDA agencies and offices will ensure that transparency is addressed in their review of the information prior to its dissemination.
- USDA agencies and offices will ensure that disseminated information is accessible to all persons pursuant to the requirements of Section 508 of the Rehabilitation Act.

### **Integrity**

- USDA agencies and offices will protect information they maintain from unauthorized access or revision to ensure that disseminated information is not compromised through corruption or falsification.
- USDA agencies and offices will secure their information resources by implementing the programs and policies required by the Government Information Security Reform Act.
- USDA agencies and offices will maintain the integrity of confidential information and comply with the statutory requirements to protect the information it gathers and disseminates. These include: The Privacy Act of 1974, as amended; The Paperwork Reduction Act of 1995; The Computer Security Act of 1987; The Freedom of Information Act; and OMB Circulars A-123, A-127, and A-130.

USDA's information quality guidelines require public disclosure of requests for correction of information disseminated by USDA. The guidelines state that "Each USDA agency will establish an information quality page on its Web site on which it will post requests for corrections of information, requests for reconsideration, and actions taken by the agency in response to such requests. The information quality page will include information on who requested the correction, the nature of the request, any specific corrections made, the reason they were made, and any appropriate supporting documents." The information quality page for OCE may be found at [http://www.usda.gov/oce/about\\_oce/data.htm](http://www.usda.gov/oce/about_oce/data.htm).

The OCE information quality guidelines indicate that we will review the information you provide in support of your request for correction of information; determine whether a correction

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is warranted; and if so, what action to take within 20 working days.<sup>1</sup> However, if we determine that our response will take more than 20 days to resolve, we will state the reason for taking a longer time to process the request and provide an estimated decision date.

Based on the substantial amount of material that you provided with your request, we will need to more than 20 working days to respond to your request. The USDA guidelines for processing such requests indicate that agencies normally can respond within 60 calendar days of receiving a request for correction of information.<sup>2</sup> We anticipate that our review of your request and our determination can be completed in that time period (i.e., by July 13, 2015). If, during the course of our review, we determine that additional time will be necessary, we will inform you at that time of the reason for such a request and the expected time period needed to fully complete our review and determination.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Johansson", with a long horizontal flourish extending to the right.

Robert Johansson  
Acting Chief Economist

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<sup>1</sup> [http://www.usda.gov/oce/about\\_oce/data.htm](http://www.usda.gov/oce/about_oce/data.htm)

<sup>2</sup> <http://www.ocio.usda.gov/policy-directives-records-forms/guidelines-quality-information/correction-information>