



## POLICY & ACTION FROM CONSUMER REPORTS

COOL Division; Livestock, Poultry, and Seed Program  
Agricultural Marketing Service  
U.S. Department of Agriculture (USDA)  
Room 2614-S, STOP 0216  
1400 Independence Avenue SW  
Washington, DC 20250-0216

Submitted via [www.regulations.gov](http://www.regulations.gov).

**Comments of Consumers Union on the  
Agricultural Marketing Service Proposed Rule on  
Addition of Mandatory Country of Origin Labeling Requirements for Venison  
Docket No. AMS-LPS-16-0014**

Prepared by  
Michael Hansen, Ph.D., Senior Scientist  
April 13, 2017

Consumers Union, the policy and mobilization arm of Consumer Reports,<sup>1</sup> welcomes the opportunity to comment on the proposed rule by the U.S. Department of Agriculture (USDA) Agricultural Marketing Service (AMS) to add venison and ground venison to the list of covered commodities subject to mandatory country of origin labeling (COOL) regulations. We strongly support USDA's proposal to require that muscle cuts and ground meat from farmed mammals belonging to the deer family, Cervidae, be labeled as to the country of origin in terms of where they were born, raised, and slaughtered. Polls show widespread support for COOL among U.S. consumers.

As part of mandatory COOL requirements for deer meat, we support the proposed definitions for Cervidae, ground venison, and venison, as well as for various changes to existing definitions (such as "covered commodity," "production step," "raised," "slaughter," and others) in which the agency proposes to add a reference to venison. We agree with AMS's broad definition of venison and ground venison as meat coming from the deer family (Cervidae), which is defined as "any one of the various species that are raised for the production of venison meat, such as whitetail deer, elk, fallow deer, axis deer, sika, red deer (maral), musk deer, rusa deer,

---

<sup>1</sup> Consumers Union is the policy and mobilization arm of Consumer Reports, an independent, nonprofit organization that works side by side with consumers to create a fairer, safer, and healthier world. As the world's largest independent product-testing organization, Consumer Reports uses its more than 50 labs, auto test center, and survey research center to rate thousands of products and services annually. Founded in 1936, Consumer Reports has over 7 million subscribers to its magazine, website, and other publications.

antelope, nilgai, pronghorn, reindeer, and caribou.” It is best that venison is defined as being any meat from any cervid raised for human food, rather than restricting the definition to a few deer genera. The rule appropriately applies to deer producers (ranchers), slaughterhouses, processors, importers, wholesalers, distributors, and retailers of venison, but also appropriately specifies that “[b]reeding and hunting and hunting-only operations are not considered to be producers of venison for consumption that are subject to COOL.”

We support mandatory COOL regulation for farm-raised venison and venison meat for reasons of informed choice by consumers, and for potential food safety issues. In general, we support a consumers’ right to know where the food they eat originated. Some consumers may prefer to buy meat that is produced locally; others may prefer products from another country. In addition, COOL regulations for venison could help consumers that are concerned about a potential health implication of chronic wasting disease (CWD). Chronic wasting disease is a fatal brain-wasting disease caused by prions that affect cervids, including deer, elk, moose, and reindeer. It was first recognized in the late 1960s and described in 1980 in mule deer and black-tailed deer held in captivity in Colorado and Wyoming.<sup>2</sup> For a couple of decades, CWD was restricted to just Colorado and Wyoming. However, in part due to the trade in wild deer and elk for game farms and hunting, CWD has now spread from Colorado and Wyoming to 24 states in the U.S., two provinces in Canada (from deer originally imported from the U.S.)<sup>3</sup>, South Korea (from elk imported from Canada in 1990s),<sup>4</sup> and, recently, wild reindeer in Norway.<sup>5</sup> However, a majority of the venison imported to the United States comes from New Zealand, which has not detected CWD in its cervids.<sup>6</sup>

CWD is a transmissible spongiform encephalopathy (TSE), a class of diseases that includes scrapie in sheep, bovine spongiform encephalopathy (BSE) (mad cow disease), transmissible mink encephalopathy (TME), and, in humans, kuru, Creutzfeldt-Jacob Disease (CJD) and Gerstmann-Sträussler-Scheinker disease. CWD, compared to BSE, TME and CJD, is more easily spread between animals because the infectious prions that are the cause of the disease are found at high levels in various body tissues and also in bodily fluids such as urine, feces and saliva.<sup>7</sup> Captive or farmed animals are at a much higher risk for CWD than wild animals.<sup>8 9</sup> The

---

<sup>2</sup> Williams ES and S Young. 1980. Chronic wasting disease of captive mule deer: a spongiform encephalopathy. *Journal of Wildlife Disease* 16(1): 89-98.

<sup>3</sup> Geist V, Clausen D, Crichton V and D Rowledge. 2017. The Challenge of CWD: Insidious and Dire. At: [apwildlife.org/publications/](http://apwildlife.org/publications/)

<sup>4</sup> Lee YH, Sohn HJ, Kim MJ, Kim HJ, Lee WY, Yun EI, Tark DS, Cho IS and A Balachandran. 2013. Strain Characterization of the Korean CWD Cases in 2001 and 2004, *Journal of Veterinary Medical Sciences* 75(1): 95-98. At: [www.jstage.jst.go.jp/article/jvms/75/1/75\\_12-0077/\\_pdf](http://www.jstage.jst.go.jp/article/jvms/75/1/75_12-0077/_pdf).

<sup>5</sup> Benestad SL, Mitchell G, Simmons M, Ytrehus B and T Vikøren. 2016. First case of chronic wasting disease in Europe in a Norwegian free-ranging reindeer, *Veterinary Research* 47: 88. At: [veterinaryresearch.biomedcentral.com/articles/10.1186/s13567-016-0375-4](http://veterinaryresearch.biomedcentral.com/articles/10.1186/s13567-016-0375-4).

<sup>6</sup> New Zealand also is one of only two countries that the U.S. has declared free of scrapie, a version of this disease found in sheep. National Institute for Animal Agriculture. 2001. Scrapie Fact Sheet. At: [www.eradicatescrapie.org/About%20Scrapie/Fact%20Sheet.html](http://www.eradicatescrapie.org/About%20Scrapie/Fact%20Sheet.html).

<sup>7</sup> Geist et al. 2017. *Op cit.*

<sup>8</sup> *Id.*

impact of CWD on people is not well understood, but the evidence may lead some consumers to want information about where farmed venison was raised. An in vitro study demonstrated that CWD prions can convert human prions to the infectious form; the conversion is not very efficient, but is about as efficient as BSE prions,<sup>10</sup> which have been known to cause illness in people. A small 2015 study with mice engineered to express human prion proteins found that an elk CWD isolate was able to cause disease in two out of five humanized mice.<sup>11</sup>

Given that CWD has been found in the U.S., Canada, South Korea, and Norway, that farmed cervids are more likely to contract CWD than wild animals, and that the majority of imported venison comes from New Zealand, where neither CWD nor scrapie occur, having mandatory COOL requirements for venison and ground venison would allow consumers to exercise informed choice if they are very concerned about CWD.

Ultimately, in general, consumers are highly supportive of COOL. Food labeling surveys carried out by the Consumer Reports National Research Center have consistently shown that over 90% of consumers polled want COOL, with our most recent 2016 poll finding that 93% of consumers want to know if their meat is from outside the U.S.<sup>12</sup>

Thus, we strongly support requiring COOL for venison. Thank you for your consideration of our comments.

Respectfully submitted,



Michael Hansen, Ph.D.  
Senior Scientist  
Consumers Union

---

<sup>9</sup> Pritzkow S, Morales R, Moda F, Khan U, Telling GC, Hoover E and C Soto. 2015. Grass plants bind, retain, uptake, and transport infectious prions. *Cell Reports* 11: 1168-1175. At: [www.cell.com/cell-reports/pdf/S2211-1247\(15\)00437-4.pdf](http://www.cell.com/cell-reports/pdf/S2211-1247(15)00437-4.pdf).

<sup>10</sup> Raymond GJ, Bossers A, Raymond LD, O'Rourke KI, McHolland LE, Bryant PK, Miller MW, Williams ES, Smits M and B Caughey. 2000. Evidence of a molecular barrier limiting susceptibility of humans, cattle and sheep to chronic wasting disease. *The EMBO Journal* 19(17): 4425-4430. At: [emboj.embopress.org/content/19/17/4425.long](http://emboj.embopress.org/content/19/17/4425.long).

<sup>11</sup> Geist et al. 2017. *Op cit*.

<sup>12</sup> Consumer Reports. 2016. Food Labels Survey. At: [greenerchoices.org/wp-content/uploads/2016/08/2016\\_CRFoodLabelsSurvey.pdf](http://greenerchoices.org/wp-content/uploads/2016/08/2016_CRFoodLabelsSurvey.pdf).