

**IOWA CATTLEMEN'S ASSOCIATION**  
2055 Ironwood Court | Ames, IA 50014 | 515-296-2266

## **MCOOL vs. Product of the USA Labeling**

### **ICA Fact Sheet | March 2026**

#### **History**

Country of Origin Labeling (COOL) requirements in the United States have their roots in the Tariff Act of 1930, which required most imported goods to disclose their country of origin to the “ultimate purchaser.” Under this framework, agricultural products such as live or dead animals were largely exempt if only minimally processed for transport. The Federal Meat Inspection Act authorized the U.S. Department of Agriculture (USDA) to regulate the labeling of imported meat and poultry, requiring country of origin information on retail-ready packages or shipping containers. Before 2012, USDA policy treated domestic processors and slaughterhouses as the “ultimate purchasers,” meaning that imported or mixed-origin meat could be labeled only with the processor’s location (e.g., “Processed in the U.S.”), rather than the true country of origin.

The 2002 Farm Bill significantly changed this by amending the Agricultural Marketing Act of 1946 to require retail-level MCOOL for ground and muscle cuts of beef, pork, and lamb, among other commodities. These requirements were clarified through the 2008 Farm Bill and implemented by USDA’s final rule in March 2009. Following implementation, then-Secretary of Agriculture Tom Vilsack encouraged the meat and food industries to voluntarily use more detailed labels such as “Born, Raised, and Slaughtered in the United States” to improve transparency for consumers.

Soon after MCOOL’s rollout, Canada and Mexico challenged the labeling requirements for beef and pork before the World Trade Organization (WTO). They argued that the U.S. rules discriminated against imported livestock and created undue recordkeeping and segregation burdens for processors. Between 2011 and 2012, WTO panels found that the U.S. MCOOL regulations violated trade agreements by providing less favorable treatment to imported cattle and hogs. The United States amended its rule in 2013 to include more detailed production-step labeling, specifying where animals were born, raised, and slaughtered.

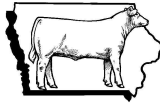
Despite the revisions, Canada and Mexico again prevailed in subsequent WTO challenges in 2014 and 2015. The WTO ruled that even the amended COOL regulations imposed technical barriers to trade and authorized Canada and Mexico to impose approximately \$1 billion in retaliatory tariffs against the United States. In response, Congress acted to remove beef and pork from the list of covered commodities in the 2016 Consolidated Appropriations Act. Following that legislation, USDA confirmed that it would no longer enforce MCOOL requirements for beef and pork products, including ground products.

As a result, mandatory country of origin labeling for beef and pork is no longer required in the United States. COOL requirements remain in effect for other commodities such as lamb, chicken, goat, fish, shellfish, peanuts, pecans, macadamia nuts, and ginseng. Recent Supreme Court rulings in 2024 that limit judicial deference to agency interpretations and expand the window for challenging agency actions could affect how any future COOL-related regulations are implemented or contested.

#### **Deregulation of COOL for Beef & Pork**

In 2016, the U.S. Department of Agriculture (USDA) finalized a rule to remove beef and pork from the list of covered commodities under the Mandatory Country of Origin Labeling (MCOOL) program. This action was required by the Consolidated Appropriations Act of 2016, which directed USDA to eliminate mandatory origin labeling for muscle cuts

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and ground products of beef and pork in response to World Trade Organization (WTO) rulings that found U.S. MCOOL requirements discriminatory toward imports from Canada and Mexico.

The USDA's economic analysis estimated that removing beef and pork from MCOOL would save affected industries up to \$1.8 billion in avoided costs. These savings reflect reduced expenses related to labeling, segregation of livestock by origin, documentation, and verification requirements. Estimated cost savings included roughly \$462 per producer, \$47,000 per intermediary (processors, handlers, or wholesalers), and \$20,000 per retailer.

The rule's primary economic benefit was the reduction in operational costs for firms throughout the beef and pork supply chain, from cattle and hog producers to meat retailers, leading to a small but positive effect on U.S. consumer purchasing power and economic activity. The costs of the rule were largely limited to the loss of information for consumers who valued knowing the origin of beef and pork products.

COOL requirements remain active for other commodities such as lamb, chicken, goat, fish, and select agricultural products.

### Product of the USA Final Ruling

In 2024, USDA's Food Safety and Inspection Service (FSIS) issued a final rule redefining when meat, poultry, and egg products may use voluntary "Product of USA" and "Made in the USA" claims. The rule was developed in response to consumer confusion, industry petitions, and President Biden's Executive Order *Promoting Competition in the American Economy*. **Full compliance went into effect January 1, 2026.**

Under the new rule, the voluntary claims "Product of USA" and "Made in the USA" may only be used if:

- **The animal was born, raised, slaughtered, and processed in the U.S. (for single-ingredient products).**
- **For multi-ingredient products, all FSIS-regulated ingredients meet that standard, and other ingredients (except spices and flavorings) are of domestic origin with all processing and preparation in the U.S.**
- **State or locality claims (e.g., "Product of Iowa") and use of U.S. or state flags on packaging are treated as origin claims and must meet the same criteria.**
- **Companies using voluntary origin claims must maintain documentation verifying compliance but may choose their recordkeeping method.**

The 2024 FSIS final rule requires companies that voluntarily use U.S.-origin claims on meat, poultry, and egg products to update labels and strengthen recordkeeping systems to ensure those claims meet the new definition ("born, raised, slaughtered, and processed in the U.S."). While the rule is voluntary, businesses choosing to continue using these claims will incur modest compliance costs.

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