



May 1, 2023

Willy Horne, Ph.D.  
Livestock and Poultry Program  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Ave SW  
Washington, DC 20250

**RE: NCBA Feedback Regarding Procedures Related to the Use of Instrument Technology in the Official Meat Grading Program**

Submitted via email: [willy.horne@usda.gov](mailto:willy.horne@usda.gov)

Dear Dr. Horne:

The National Cattlemen's Beef Association (NCBA) appreciates the opportunity to submit feedback regarding the Agricultural Marketing Service's ("the Service") proposed revisions to the procedures related to the use of instrument technology in the official meat grading program (collectively, the "Proposed Revisions"). NCBA is the oldest and largest national trade association representing the interests of the U.S. cattle industry, with over 25,000 direct members and approximately 178,000 represented through our 44 state affiliate organizations.

**Statement of Concurrence**

Certified Angus Beef (CAB) is a member and valued partner of NCBA. As the first U.S. Department of Agriculture (USDA) certified beef program, which relies heavily on beef Quality Grades, their team possesses an intricate and highly sophisticated knowledge of the minutia pertaining to beef carcass grading. NCBA wishes to associate ourselves with the feedback submitted by CAB pertaining to the Proposed Revisions and has committed to work closely with them on general beef carcass grading issues moving forward.

**Background**

The USDA Quality Grades of Prime, Choice, and Select have a long history in the beef business and indicate quality of beef products. Their use and prominence have made the grade an inherent and critical component of marketing U.S. beef, both domestically and abroad. In fact, according to information reported in the Service's Cattle Contracts Library pilot program, Quality Grade plays at least some role in determining the final net price for fed cattle in almost 90% of formula transactions. NCBA's members, through our organization's century-old, grassroots policymaking process, have repeatedly and enthusiastically stated their support for the Service's beef carcass grading program, and have periodically provided recommendations for improvements over the years.

NCBA was an early supporter of instrument grading tools when they were first introduced several years ago. Because of the high value associated with the different Quality Grades, we continue to support the use

of instrument technology to reduce subjectivity in the federal grading process. While well-trained, experienced human graders are an essential component of the process, cameras and related technology have helped increase consistency in grading calls from plant to plant and region to region. As such, NCBA supports their continued use, provided the underlying software and usage protocols continue to produce results which are consistent with the latest scientific and industry standards.

### **Marbling Scores**

Paramount to the integrity of the Service's grading program is consistency and alignment between the Gold Standard Committee (GSC) metrics—against which current instruments are calibrated—and the subjective calls of field graders who have the authority to override a camera call. While the GSC remains an important calibration tool for grading instruments, the standards they posit are still based on a subjective, albeit sophisticated, interpretation of the specific carcass presented for analysis. As science has evolved, along with the industry's understanding of intramuscular fat behavior, more objective means of grading have been suggested by subject matter experts and the academic community. The Service should carefully consider, in the interest of improved consistency, whether these quantitative measures can be adopted for ease of replication across USDA-approved instruments.

### **Increased Need for Instrument Grading Access**

Other mission areas within USDA have allocated substantial resources to strategically increase meat and poultry processing capacity. Many of the facilities involved in these federal programs are very small, or small processors in various stages of construction or expansion. Several of these facilities have expressed an interest in accessing the Service's beef carcass grading program.

The grading instruments currently approved by the Service are incredibly expensive. NCBA is aware of many smaller, regional beef packing facilities that would implement a USDA Quality Grade program were the necessary technology less cost prohibitive. As such technology becomes available, the Service should ensure that these smaller facilities can fairly access grading services without compromising the integrity of the program. To the previous point regarding marbling scores, alignment with more objective means of grade determination is a crucial component in balancing the scales between access to grading and preservation of the reputation the Quality Grades enjoy with consumers. Consistency is key.

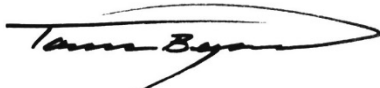
### **Opportunities for Public-Private Collaboration**

NCBA and CAB are currently developing a loosely structured task force, representing various segments of the beef supply chain, to meet on a regular basis to discuss our continued support and potential suggestions for improvement regarding the federal beef carcass grading program. The mission of this group is to keep the industry apprised of the latest discussions pertaining to the federal beef carcass grading program and to maintain a resource for the Service should they seek industry input on a particular related topic. We would welcome USDA's involvement through these open and transparent dialogues as we seek to uphold the integrity of the Quality Grades consumers across the globe have come to trust and appreciate.

## Conclusion

Thank you for allowing us to submit feedback on behalf of our members—America's beef producers. Please do not hesitate to contact NCBA's Center for Public Policy with any questions or concerns you may have.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Tanner Beymer", with a large, sweeping flourish extending to the right.

Tanner J. Beymer  
Senior Director, Government Affairs  
National Cattlemen's Beef Association