

The USRSB was appreciative of the level of commitment and number of comments received on the Framework during the first round of public commentary. The USRSB evaluated each and every comment, provided a response and revised the Framework as the USRSB deemed appropriate based on public commentary and given the multistakeholder approach. The following are items to keep in mind when readers are reviewing the anonymous public commentary and corresponding USRSB responses:

- Readers will see duplicative comments, this is due to multiple individuals and/or organizations submitting the same comments, separately.
- Public comments have not been edited for grammar or spelling, and have been left in original form as they were submitted during the comment period.
- This document is alphabetized by public comment.
- In public comments that refer to document line numbers, due to Framework revisions these line numbers will no longer be consistent with the document available for the second round of public commentary.

If readers have additional comments, edits, or questions please submit these during the second round of public commentary on the USRSB Framework, at <http://www.usrsbframework.org/>

Reference #	Public Comment	USRSB Response
1	Given that a significant portion of beef's environmental footprint is related to feed production, it is disappointing that the Framework mostly only references the work of Field to Market when it comes to feed sustainability. The Framework would be much stronger if it summarized the relevant work of Field to Market and clarified how the USRSB standards specifically align with this ongoing work.	The USRSB and Field to Market have entered into a collaboration agreement to explore how the two sustainability initiatives can jointly work together to address feed sustainability. This collaboration is still in its infancy. We recognize the importance of addressing feed sustainability and look forward to making progress in this space through our collaboration with Field-to-Market.
2	The packer, processor and foodservice metrics address topics that are timely and of importance to both internal and external stakeholders. For example, animal well-being and greenhouse gas emissions are focus areas of great importance to our team as well as our customers, consumers, and non-government partners. While this is positive and demonstrates the credibility of the metrics, there are opportunities to improve the metrics and subsequent adoption of their use. The Integrity Beef Sustainability pilot is currently working on a tool that will provide businesses in each segment with a more detailed assessment of their operation and identify areas where improvement is needed relative to the indicators.	Based on your comment, we have increased the quality of the resources provided. As the Framework will continue to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.
3	<ul style="list-style-type: none"> -reductions in the numbers of wild animals, especially predators, killed for livestock protection purposes (and in the percentage of cases of species listings under federal and state Endangered Species Acts that are attributable to poorly managed livestock operations); - reductions in land use changes associated with beef production, especially in conversion of native grasslands to intensively managed hay and feed crop fields, with the goal of zero additional conversion and indeed the restoration of native habitat; - improvements in animal welfare demonstrated by a significant increase in the percentage of products carrying a meaningful independent, third-party animal welfare certification including Certified Animal Welfare Approved by A Greener World, Grasslands Alliance, GAP, and Certified Humane,; - increased sourcing of beef verified by meaningful independent grassfed and sustainability certifications including USDA Organic, American Grassfed Association, Certified Grassfed by A Greener World, Grasslands Alliance, and Food Alliance. - increases in prices paid to producers for delivering higher quality beef produced using practices that generate measurable improvements in soil health, water and air quality, habitat quality and biodiversity, measurably less heat-trapping pollution, and improvements for public health, safe and fair working conditions, and animal welfare---with a focus on supporting meaningful pasture based grass finished systems that do not rely on feedlots or confinement; and - reductions in labor violations in processing plants. 	<p>As the USRSB cow-calf sector actively engaged in the development of the metrics, those cattlemen and women identified Grazing Management Plans as the primary focus for cattle producers to select management practices that are most appropriate for their operation and their location, and prioritize where it makes the most sense for them to focus on further improving their operations. This emphasis on GMPs will help improve pasture management, water quality, soil health and wildlife habitat. We have added resources to aid producers in minimizing negative interactions with predators.</p> <p>While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level is most appropriate for them.</p> <p>Regarding different types of beef production systems (i.e., grain vs. grass finishing) the mission and vision of the USRSB focuses on the environmentally sound, socially responsible and economically viable production of beef in the U.S., regardless of the type of production system. Each type of beef production should be evaluated under the auspices of the six high priority indicators. The USRSB guidance is intended to support and improve all forms of beef production. We have included language in the introduction section of this document to ensure that point is clear.</p> <p>Lastly, labor issues at packing plants have been addressed by the USRSB by identifying Employee Safety & Well-being as one of the six high priority indicators. In the packer/processor section of our work, specific metrics for Employee Safety & Well-being have been developed.</p>
4	"Make CO2e publicly" available	We are unclear what you are referring to. Please let us know during the second comment period if it has been addressed.
5	...and since when do we the Beef Industry needs to be involved with WWF a environmental group that wants to eliminate animal protein!.... This seems to Shady there's too many non transparency between ncba ,WWF, check off program ,cheetah Foundation the conservatory and other environmental groups.....let alone the manipulation of collusion with the major Packers too many agendas and no benefit for the producer.	The USRSB is a collaborative effort whose mission is to Advance, support and communicate continuous improvement in the sustainability of U.S. beef production by educating and engaging the beef value-chain through a collaborative multi-stakeholder effort. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
6	<ul style="list-style-type: none"> -Antibiotic-Resistant Superbugs: America uses more antibiotics/lb. of meat produced⁴¹ than any other nation. According to the Food and Drug Administration, 80% of antibiotics sold in the U.S. are fed to livestock⁴². Of that, feedlots use about 70%⁴³ for "non-therapeutic" purposes (routine feeding of antibiotics to healthy animals⁴⁴ to prevent disease and promote growth). Misuses of antibiotics breed antibiotic-resistant superbugs⁴⁵, reducing the effectiveness of critical life-saving medications. - Harm to Native Fish, Wildlife & Plant Biodiversity: Feedlots and feed production harm our natural heritage in several ways: <ul style="list-style-type: none"> - Water pollution from feedlots and feed croplands causes fish kills⁴⁶. In 2010, a CAFO in Iowa discharged effluent that killed over 100,000 fish⁴⁷, with the economic impact of lost fish, alone, estimated at \$100,000. - Nitrogen pollution of soils reduces biodiversity⁴⁸, worsens weed invasions⁴⁹, and increases use of herbicides toxic to fish and wildlife. Over-applying herbicides creates "superweeds"⁵⁰, escalating a cycle in which farms use increasingly harmful chemicals. - Feed crops largely come from vast monoculture farms devoid of biodiversity⁵¹. Many convert native ecosystems to croplands⁵², destroying native plant and wildlife habitats. They also use controversial pesticides⁵³ that endanger pollinators⁵⁴; - Feed often includes genetically-modified grains that have been irresponsibly deployed⁵⁵, resulting in unintended consequences such as declines in monarch butterflies⁵⁶; - Even feedlot pharmaceutical use can harm fish and wildlife. Conservation Magazine reported that⁵⁷, "resistant bacteria have started spilling into the environment and trickling into a variety of species," from marine mammals and seabirds⁵⁸ to fish⁵⁹. As one researcher noted⁶⁰, "we're finding similar pathology...in marine mammals to what we're seeing in our livestock cases." According to the article⁶¹, "the pathway from factory farm to sea is likely manure that runs off into streams and ends up in the ocean." 	The USRSB has identified six high priority sustainability indicators which are covered extensively in the sustainability framework and address water, land and air resources, as well as animal health and well-being. For each sector of the value chain, we have identified metrics and resources to help individual operations continuously improve over time.

7	<p>-opposing the Farm Bill provisions originally proposed in the House Agriculture committee bill that eviscerate key conservation programs and gut environmental enforcement and states' rights to pass human health, environmental, and animal welfare protections.</p> <p>- supporting increased conservation funding in the Farm Bill to enable greater technical assistance and support for producers.</p> <p>- increases in the minimum wage for workers</p> <p>- increased transparency and data collection including toxic emissions generated by CAFOs.</p> <p>- strong enforcement of existing Clean Water Act protections.</p> <p>- strong enforcement of existing protections for America's native fish, wildlife and plant biodiversity, especially endangered species and habitats;</p>	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Regulatory affairs and legislative lobbying are out of scope of the USRSB.
8	1. Animal health, wellbeing, etc., are included as sustainability criteria but product wholesomeness (human channel) is not included as a criterion. Why?	During the indicator development process, the USRSB agreed to identify a group of six high priority indicators. When reducing the number from 13 to 6 (first round of indicator development reduced the number from 160 to 13), the group agreed unanimously that the indicators Consumer Perception, Transparency and Profitability should be considered crosscutting requirements across multiple indicators and would not be identified as one of the specific high priority indicators. In other words, the USRSB believes that profitability is foundational to all indicators. Additionally, the USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business. For food safety, similarly the group agreed that food safety was foundational for the viability of the beef supply chain, touching every facet of beef
9	1. As a hamburger company, X is proud to sell beef and sees responsible beef production as an essential element of a sustainable food system in the US. X is committed to collaborating with the full value chain to drive improvement across the industry but also recognizes that the cow/calf and feedyard sectors play the most important roles in demonstrating beef's role in and producers' commitment to sustainable food systems.	Thank you for your engagement in this work and for promoting the sale of U.S. beef as a hamburger company. As the initial work of the USRSB focused on aligning to the six high priority indicators, followed by development of metrics and sustainability assessment guides, an expectation was established to help ensure that addressing and improvement the sustainability of the U.S. beef value chain lies with the entire chain, not one sector or another.
10	<p>10. Address barriers to advancing sustainability on federal public land grazing allotments managed by the U.S. Forest Service (USFS) and U.S. Bureau of Land Management (BLM).</p> <p>-There is an urgent need to incentivize better management of livestock grazing on federal public lands managed by the USFS and BLM. Grazing management on these lands has long been challenging for various (and often complex) reasons. This is an area ripe for innovative, incentive-based solutions.</p> <p>- The beef industry must stop working to prevent, delay or weaken efforts to improve grazing management on federal public lands that are degraded by poor management. This issue is important because a small proportion of U.S. beef production (probably between 2-4%) (approximately 2000 operators) is negatively impacting ecosystem health, water quality, and biodiversity on 50-75 percent of public lands. Livestock, mostly beef cattle, graze over 200 million acres of federal public lands, and Public Employees for Environmental Responsibility reported that²¹, "Overall, 30% of (BLM) allotments by area surveyed to date suffer from significant livestock-induced damage, suggesting that once the remaining allotments have been surveyed, the total impaired area could well be larger than the entire State of Washington." Grazing management on these lands is too often poor for various reasons – from conflicts among stakeholders over resource degradation, to outside political influence, to links between animal unit month (AUM) numbers, ranch property values²², and associated bank loans²³. While there are some stories of bright spot agency managers and districts, vast areas of our public lands continue to be degraded by poor grazing management²⁴, leading to conflicts (and litigation) between agencies, ranchers, and conservationists. This is an area ripe for innovative, incentive-based solutions.</p> <p>-We encourage the USRSB to identify ways to support "win-win" policy solutions for public lands grazing allotments plagued by issues of concern that make livestock production increasingly challenging such as federal grazing allotments located in regions plagued by (a) increasingly frequent and severe drought and declining economic viability of livestock production, and (b) frequent conflicts with valued keystone predators (e.g., grizzly bears, wolves) that inhabit a small percent of American lands. Specifically, we urge the USRSB to support policies that offer producers in these situations the opportunity to permanently retire their grazing permits in exchange for property and grazing permits in areas more favorable for livestock production.</p>	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Additionally, regulatory affairs and legislative lobbying in out of scope of the USRSB.
11	10. I must say that it is a little disingenuous to include what I assume to be accurate stats re the percentage of producers, feeders, processors, etc., that are members of the Roundtable without clarifying that those stats really relate to the %age of animals, etc. represented by those players. Within the last month or two, I heard that the research arm of Pew Charitable Trusts completed a study that showed that every sector in the beef value chain has continued to consolidate – except the producer sector (read: ranchers). As you know, there are fewer but larger feeding operations, far fewer and far larger corporate entities that engage in processing, far fewer distributors, etc. To illustrate, six or seven processors account for 80% of the hd/lb of beef killed and fabricated in the U.S. Indeed, one of your members, National Beef, if I recall the pertinent slide correctly, is in the final stages of closing its sale to another larger processor. It would be much better disclosure and more defensible to say for each sector that, for example, "Seven Roundtable members, representing 12% of the 58 processors nationally that slaughter or fabricate more than 25,000 head per year, produce more than 80% of the beef produced from animals raised in the United States." The number of producer (my definition) members would be I'm sure far less than 1% of all domestic producers. Finally, by including what I consider downstream entities in the Producer definition, you create the false impression that much or most of the producer industry is involved already in the Roundtable.	USRSB did intend to showcase that our membership represented a large portion of the beef that is produced in the U.S. on a percentage basis. We will make this clearer to the reader in an added introduction section.
12	10. USRSB should work with partners in the insurance industry to offer (a) lower livestock loss and crop insurance premiums to producers who implement practices that improve soil health and resilience to our changing climate; and (b) lower livestock loss insurance premiums to producers who implement non-lethal practices for reducing conflicts with predators and other native wildlife.	There is a brief discussion on risk management, in the Cow-Calf Sector SAG. We agree generally that there should be an expanded discussion of the benefits of risk management, which should include insurance and preparations for contingencies like drought or increasing climate variability. We will consider this expanded discussion in future revisions of the Framework document.
13	11. USRSB should work with partners in the insurance industry to offer (a) lower livestock loss and crop insurance premiums to producers who implement practices that improve soil health and resilience to our changing climate; and (b) lower livestock loss insurance premiums to producers who implement non-lethal practices for reducing conflicts with predators and other native wildlife.	There is a brief discussion on risk management, in the Cow-Calf Sector SAG. We agree generally that there should be an expanded discussion of the benefits of risk management, which should include insurance and preparations for contingencies like drought or increasing climate variability. We will consider this expanded discussion in future revisions of the Framework document.
14	15 http://www.energy.ca.gov/2009publications/CEC-500-2009-025/CEC-500-2009-025-D.PDF	Thank you for providing these resources.
15	16 https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/technical/nra/nri/	Thank you for providing these resources.
16	17 https://digitalcommons.usu.edu/cgi/viewcontent.cgi?article=2809&context=extension_curall 18 https://www.sciencedirect.com/science/article/pii/S0308521X17310338 19 https://onlinelibrary.wiley.com/doi/abs/10.1111/ejss.12194	Thank you for providing these resources.
17	2. A consistent numbering system across the sectors, indicators and metrics would be very helpful for referencing questions/metrics, especially for the sectors that have multiple questions for each indicator.	We have made the suggested change.

18	<p>2. Air and greenhouse gas emissions. It was very encouraging to see that USRSB emphasized flexibility and variability of mitigation practices within the air and greenhouse gas sections of the framework. However, many details regarding emissions reductions were missing, especially from the cow-calf and feedyard sectors. Within the cow-calf section on air and greenhouse gas emissions, manure emissions are not mentioned a single time and methane is mentioned once. In reality, the cow-calf sector generates the majority of emissions within the cattle lifecycle but is currently making great progress towards sustainability. Therefore, the lack of discussion on greenhouse gas mitigation within the feedyard sector is even more troubling. Not only should the framework explain the emissions and their sources in each production step, it should also be clearer on the range of practices that can reduce emissions and should help ranchers and managers make targeted decisions on their operations to reduce emissions. This could be done by providing more details on emissions, practices, and trade-offs, which can help farmers understand how changing management will help mitigate their emissions (or links pointing farmers to other resources).</p>	<p>The producer sectors selected the current metrics because they believe they offer the greatest opportunity to mitigate Air & Greenhouse Gas Emissions. We have included more content on manure-related GHG emissions, and specific management practices for the feedyard sector. As mentioned in your comment, this could be accomplished with the addition of more links to other resources that producers could utilize. Additionally, USRSB recognizes the quickly evolving research in this area and will continue to evaluate and incorporate more resources as they become available to aid in producer decision-making. As with almost all indicators, for the producer sector they are all interrelated and are not mutually exclusive. Due to this relationship, the metrics under the Efficiency & Yield indicator for both the cow-calf and feedyard sectors will also mitigate greenhouse gas emissions.</p>
19	<p>2. Failure to address the most common threats to wildlife and the environment from beef production, including cattle grazing. To develop these metrics and effectively monitor beef producers for verified sustainability certification, the USRSB must show that it takes sustainability seriously by beginning to systematically address the major environmental impacts inherent to beef production. This includes reducing the percentage of habitat that is overgrazed and improving rangeland management practices to increase the health of ecosystems and protect endangered species. Habitat protection through the reduction of native grasslands converted to feed crop fields is also necessary. Additionally, the industry as a whole, as well as individual producers, must address and reduce the mileage of waterways polluted by livestock grazing and feedlot operations. The framework must also include effective steps to reduce real or perceived conflicts between grazing cattle and native wildlife. Guidance materials must include nonlethal measures for reducing conflicts with predators and other wildlife, including via trainings on existing methods (including rangeland riders, fladry, lights, proper fencing, cleaned up bone piles and other standard nonlethal measures). In addition, the industry must establish goals to reduce the number of predators directly killed by producers or at the behest of livestock operators by ensuring that management practices are based in sound science and the promotion of coexistence with native wildlife.</p>	<p>We acknowledge that there are outstanding environmental impacts of grazing land management in the United States. However, cattle grazing in itself is not a threat to wildlife. The USRSB specifically designed our framework to improve rangeland management practices and rangeland condition on multiple environmental metrics by providing tools and resources that will help ranchers meet the challenges and goals specific to their operation, including wildlife habitat (including rare and sensitive species), water quality, GHG emissions, agriculture conversion, and others. The USRSB also acted in a pre-competitive fashion to support the entire industry. As such, formal certification is beyond the scope of the USRSB. Additionally, USRSB has reached a collaborative agreement with Field to Market to work on feed sustainability. That effort is in its infancy. We have added resources to aid producers in minimizing negative interactions with predators.</p>
20	<p>2. Improve the goals, indicators and metrics for the USRSB sustainability framework: Develop indicators and metrics that address the full suite of supply chain impacts and incentivize the full suite of solutions to each, across operation types and regions. Use these metrics to establish specific goals for the industry, which could include transparent and regionally appropriate and specific and significant targets around:</p> <ul style="list-style-type: none"> - reductions in overall antibiotic use and ultimately the elimination of routine preventive use of medically important antibiotics; this is consistent with recommendations issued by the World Health Organization in November 2017. - reductions in morbidity and mortality linked to major cattle pathogens; - reductions in uses of synthetic fertilizers and pesticides (and improving input use efficiencies); - reductions in ALL heat-trapping emissions generated by beef operations (carbon dioxide, enteric methane, manure methane, nitrous oxide) and increases in soil carbon sequestration (which enhances resilience to drought and extreme weather); - reductions in miles of U.S. waterways and expanse of U.S. aquifers polluted by livestock grazing and animal feeding operations; - reductions in land use changes associated with beef production, especially in conversion of native grasslands to intensively managed hay and feed crop fields, with the goal of zero additional conversion and indeed the restoration of native habitat; - improvements in animal welfare demonstrated by a significant increase in the percentage of products carrying a meaningful independent, third-party animal welfare certification including Certified Animal Welfare Approved by A Greener World, Grasslands Alliance, GAP, and Certified Humane,; - increased sourcing of beef verified by meaningful independent grassfed and sustainability certifications including USDA Organic, American Grassfed Association, Certified Grassfed by A Greener World, Grasslands Alliance, and Food Alliance. - increases in prices paid to producers for delivering higher quality beef produced using practices that generate measurable improvements in soil health, water and air quality, habitat quality and biodiversity, measurably less heat-trapping pollution, and improvements for public health, safe and fair working conditions, and animal welfare---with a focus on supporting meaningful pasture based grass finished systems that do not rely on feedlots or confinement; and - reductions in labor violations in feedlot facilities 	<p>While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level is most appropriate for them.</p> <p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p> <p>As noted in other parts of the feedyard section, the USRSB and Field to Market have entered into a collaboration agreement to explore how the two sustainability initiatives can jointly work together to address feed sustainability. This collaboration is still in its infancy.</p> <p>The metrics for the cow-calf and feedyard sectors are both crafted to encourage producers to institute strategies and practices that will mitigate emissions and maintain or improve soil carbon storage.</p> <p>The last two bullet points in these comments address overgrazing and water quality concerns. As the USRSB cow-calf sector actively engaged in the development of the metrics to address these issues, those cattlemen and women have identified Grazing Management Plans as the primary focus for cattle producers to select management practices that are most appropriate for their operation based on their regional climate and location, and prioritize where it makes the most sense for them to focus on further improving their operations. This emphasis on GMPs will help improve pasture management, water quality, soil health and wildlife habitat. Similarly the feedyard sector chose a water resource management strategy as the most appropriate metrics for feedyards to have the flexibility to address their specific water resource challenges.</p>
21	<p>2. Improve the goals, indicators and metrics for the USRSB sustainability framework: Develop indicators and metrics that address the full suite of supply chain impacts and incentivize the full suite of solutions to each, across operation types and regions. Use these metrics to establish specific goals for the industry, which could include transparent and regionally appropriate and specific and significant targets around:</p> <ul style="list-style-type: none"> - reductions in overall antibiotic use and ultimately the elimination of routine preventive use of medically important antibiotics; this is consistent with recommendations issued by the World Health Organization in November 2017. - reductions in morbidity and mortality linked to major cattle pathogens; - reductions in uses of synthetic fertilizers and pesticides (and improving input use efficiencies); - reductions in ALL heat-trapping emissions generated by beef operations (carbon dioxide, enteric methane, manure methane, nitrous oxide) and increases in soil carbon sequestration (which enhances resilience to drought and extreme weather); - decreases in the percentage of U.S. grassland, shrubland and woodland ecosystems (rangelands) and pasture lands that are overgrazed, and corresponding improvements in rangeland health assessment results and pasture management that improves soil health and topsoil levels over time; - reductions in miles of U.S. waterways and expanse of U.S. aquifers polluted by livestock grazing and animal feeding operations; 	<p>While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level is most appropriate for them.</p> <p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p> <p>As noted in other parts of the feedyard section, the USRSB and Field to Market have entered into a collaboration agreement to explore how the two sustainability initiatives can jointly work together to address feed sustainability. This collaboration is still in its infancy.</p> <p>The metrics for the cow-calf and feedyard sectors are both crafted to encourage producers to institute strategies and practices that will mitigate emissions and maintain or improve soil carbon storage.</p> <p>The last two bullet points in these comments address overgrazing and water quality concerns. As the USRSB cow-calf sector actively engaged in the development of the metrics to address these issues, those cattlemen and women have identified Grazing Management Plans as the primary focus for cattle producers to select management practices that are most appropriate for their operation based on their regional characteristics, climate, and other factors, and prioritize where it makes the most sense for them to focus on further improving their operations. This emphasis on GMPs will help improve pasture management, water quality, soil health and wildlife habitat. Similarly the feedyard sector chose a water resource management strategy as the most appropriate metric for feedyards to have the flexibility to address their specific water resource challenges.</p>

22	<p>2. Lack of meaningful incentives, rewards and technical assistance for ranchers and farmers. Second, and directly related to the first point, even if the USRSB improves its indicators and metrics, this framework asks producers to make management changes without providing—or even encouraging—adequate financial incentives. In so doing, this program will only add burdens on producers without providing any concrete financial benefits to them. The current framework fails to specify what benefits—such as price premiums and purchasing preferences—participating producers will receive. For producers who are already struggling under a consolidated marketplace where one or two regional buyers often dictate prices, this framework fails to establish a program design that incentivizes and enables them to transition to better management practices (BMPs) that curtail the devastating impacts of poorly-managed ranches, farms and feedlots. Without clear price premium and other incentives for beef producers to adopt more sustainable practices, it will be difficult for producers to transition to lower stocking rates, and better management practices. The SAGs also fail to provide a plan for ensuring that producers have access to adequate technical and financial assistance resources to help them achieve the business benefits of sustainability. Links to related organizations are not nearly enough. We recommend supplementing these resources with real technical assistance support and sustainability-inspired business cases that show how producers have realized business benefits (e.g., price premiums, increased grass and livestock productivity, reduced input costs, improved revenues and profits) by shifting to better land and livestock management practices.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Engagement in business-to-business ventures is out of scope for the USRSB. Additionally, based on your comment, we have increased the quality of the resources provided. As the Framework will continue to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.</p>
23	<p>2. Organizational (speaking now of USRSB itself) self-assessment criteria should be made explicit and USRSB should provide an “annual report” that includes progress against those criteria.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope, mission and goals for continuous improvement of USRSB, along with further clarification around the process we have followed and will follow in the future.</p>
24	<p>2. Processors, wholesalers and retailers should provide fair pricing mechanisms, concrete purchasing preferences, and price premiums to credibly well-managed operations that provide verifiably more environmental benefits to society.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Additionally, engagement in business-to-business ventures is out of scope of the USRSB.</p>
25	<p>2. Stan Bevers formerly of Texas A&M and now runs his own consulting firm Ranch KPI has a system for livestock/ranch performance and financial accountability (ranchkpi.com). We have used this system on our ranch for over 15 years to manage performance and make timely management decisions.</p>	<p>We appreciate your resource suggestion and will pass this along to our team working on our outreach efforts.</p>
26	<p>20 Nachman, K.E. & Smith, T.J.S. (2015). Hormone Use in Food Animal Production: Assessing Potential Dietary Exposures and Breast Cancer Risk, Curr Envir Health Rpt, DOI 10.1007/s40572-014-0042-8.</p>	<p>Thank you for providing these resources.</p>
27	<p>21 https://www.peer.org/news/news-releases/livestock%E2%80%99s-heavy-hooves-impair-one-third-of-blm-rangelands.html 22 https://scholarworks.umd.edu/cgi/viewcontent.cgi?referer=&httpsredir=1&article=5817&context=etd 23 http://www.wildearthguardians.org/site/News2?page=NewsArticle&id=5406#.WzP3W9KWwwl 24 http://people.oregonstate.edu/~muirp/wpubland.htm</p>	<p>Thank you for providing these resources.</p>
28	<p>25 Gelbard, J. L. (2018). “What’s Really ‘Green’? A Look at Beef Grazing Operations.” Triple Pundit. https://www.triplepundit.com/2018/01/sustainable-beef-grazing-operations/ 26 http://www.pewtrusts.org/~media/legacy/uploadedfiles/peg/publications/report/pcfapfinalpdf.pdf 27 Ibid. 28 https://www.ucsus.org/sites/default/files/legacy/assets/documents/food_and_agriculture/cafos-uncovered.pdf 29 Ibid. 30 https://ensia.com/voices/its-time-to-rethink-americas-corn-system/?viewAll=1 31 https://www.epa.gov/sites/production/files/2018-01/documents/2018_chapter_5_agriculture.pdf 32 https://www.scientificamerican.com/article/time-to-rethink-corn/ 33 https://www.sciencedaily.com/releases/2015/04/150402081619.htm 34 https://www.esrl.noaa.gov/gmd/icdc7/proceedings/abstracts/reicoskyLU373.pdf 35 http://wwf.panda.org/our_work/food/agriculture/impacts/soil_erosion/ 36 https://www.nap.edu/catalog/12832/toward-sustainable-agricultural-systems-in-the-21st-century 37 https://www.cdc.gov/nceh/ehs/docs/understanding_cafos_nalboh.pdf 38 Ibid. 39 http://www.academia.edu/14150486/Milking_Natures_Bottom_Line_A_Full-Cost_Accounting_of_Proposed_CAFO_Operations 40 https://www.ucsus.org/sites/default/files/legacy/assets/documents/food_and_agriculture/cafos-uncovered.pdf</p>	<p>Thank you for providing these resources.</p>
29	<p>3. Endorse and form partnerships with independent third-party certifiers of beef cattle products. To make credible “sustainable” marketing claims, we encourage USRSB to use and/or endorse the best, most credible approach: partnerships with independent third-party auditing and certification organizations such as A Greener World, American Grassfed Association (AGA), USDA Organic Certifiers, Food Alliance, the Grasslands Alliance, and Predator/Wildlife Friendly. We encourage major supermarkets, restaurant chains, and beef brands to purchase a growing percentage of their beef from independent third-party certified sources over the next 5-10+ years (e.g., 25% within 5 years, 50% within 10 years, 100% by 2050). Such partnerships can use comprehensive sustainability standards not just for certification, but also as tools to guide continuous improvement on the journey to and beyond certification.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. USRSB has a program evaluation committee tasked with evaluating the equivalency of business-to-business programs against the USRSB Sustainability Framework. USRSB encourages these programs to utilize the Framework.</p>
30	<p>3. Endorse and form partnerships with independent third-party certifiers of beef cattle products. To make credible “sustainable” marketing claims, we encourage USRSB to use and/or endorse the best, most credible approach: partnerships with independent third-party auditing and certification organizations such as A Greener World, American Grassfed Association (AGA), USDA Organic Certifiers, Food Alliance, the Grasslands Alliance, and Predator/Wildlife Friendly. We encourage major supermarkets, restaurant chains, and beef brands to purchase a growing percentage of their beef from independent third-party certified sources over the next 5-10+ years (e.g., 25% within 5 years, 50% within 10 years, 100% by 2050). Such partnerships can use comprehensive sustainability standards not just for certification, but also as tools to guide continuous improvement on the journey to and beyond certification.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. USRSB has a program evaluation committee tasked with evaluating the equivalency of business-to-business programs against the USRSB Sustainability Framework. USRSB encourages these programs to utilize the Framework.</p>
31	<p>3. Feedyards and alternative finishing methods. There are many important emissions sources within the feedyard sector of beef production that were not addressed within the framework. Currently, the framework largely focuses on enteric methane and reducing dust and mostly leaves out very important emissions sources such as manure and feed production. Current research indicates that within feedlot finishing, feed production (i.e. corn grain, DDGS, soy) is the highest contributor to greenhouse gas emissions followed by methane and nitrous oxide produced during manure management. The framework neither directly addresses the unsustainability of current methods of feed production for cattle nor discusses the many tradeoffs of different methods of cattle finishing (land-use change, competition for human food, etc.) such as grass-finishing. Although grass-finishing represents a comparatively small portion of total finished cattle in the US, it is a rapidly growing market with high sustainability standards. The current framework, at the very least, should include a discussion on how the recommendations within the cow-calf sector may also apply to alternative finishing methods on pasture.</p>	<p>Regarding different types of beef production systems (i.e., grain vs. grass finishing) the mission and vision of the USRSB focuses on the environmentally sound, socially responsible and economically viable production of beef in the U.S., regardless of the type of production system. Each type of beef production should be evaluated under the auspices of the six high priority indicators. The USRSB guidance is intended to support and improve all forms of beef production. We have included language in the introduction section of this document to ensure that point is clear.</p>
32	<p>3. Going through the process of responding to each of these questions as part of X Pilot helped us identify the importance of explicitly and publicly supporting industry efforts to advance elements of the beef sustainability framework (e.g. BQA).</p>	<p>This is good reminder about the need for a robust USRSB communications plan that address both internal (within the supply chain) and external (beef consumers, general public and other stakeholder organizations) communications.</p>

33	<p>3. Improve the goals, indicators and metrics for the USRSB sustainability framework: Develop indicators and metrics that address the full suite of supply chain impacts and incentivize the full suite of solutions to each, across operation types and regions. Use these metrics to establish specific goals for the industry, which could include transparent and regionally appropriate and specific and significant targets around:</p> <ul style="list-style-type: none"> - reductions in overall antibiotic use and ultimately the elimination of routine preventive use of medically important antibiotics; this is consistent with recommendations issued by the World Health Organization in November 2017. - reductions in morbidity and mortality linked to major cattle pathogens; - reductions in uses of synthetic fertilizers and pesticides (and improving input use efficiencies); - reductions in ALL heat-trapping emissions generated by beef operations (carbon dioxide, enteric methane, manure methane, nitrous oxide) and increases in soil carbon sequestration (which enhances resilience to drought and extreme weather); - decreases in the percentage of U.S. grassland, shrubland and woodland ecosystems (rangelands) and pasture lands that are overgrazed, and corresponding improvements in rangeland health assessment results and pasture management that improves soil health and topsoil levels over time; - reductions in miles of U.S. waterways and expanse of U.S. aquifers polluted by livestock grazing and animal feeding operations; - reductions in the numbers of wild animals, especially predators, killed for livestock protection purposes (and in the percentage of cases of species listings under federal and state Endangered Species Acts that are attributable to poorly managed livestock operations); - reductions in land use changes associated with beef production, especially in conversion of native grasslands to intensively managed hay and feed crop fields, with the goal of zero additional conversion and indeed the restoration of native habitat; - improvements in animal welfare demonstrated by a significant increase in the percentage of products carrying a meaningful independent, third-party animal welfare certification including Certified Animal Welfare Approved by A Greener World, Grasslands Alliance, GAP, and Certified Humane,; - increased sourcing of beef verified by meaningful independent grassfed and sustainability certifications including USDA Organic, American Grassfed Association, Certified Grassfed by A Greener World, Grasslands Alliance, and Food Alliance. - increases in prices paid to producers for delivering higher quality beef produced using practices that generate measurable improvements in soil health, water and air quality, habitat quality and biodiversity, measurably less heat-trapping pollution, and improvements for public health, safe and fair working conditions, and animal welfare---with a focus on supporting meaningful pasture based grass finished systems that do not rely on feedlots or confinement; and - reductions in labor violations in processing plants. 	<p>While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level is most appropriate for them.</p> <p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p> <p>As noted in other parts of the feedyard section, the USRSB and Field to Market have entered into a collaboration agreement to explore how the two sustainability initiatives can jointly work together to address feed sustainability. This collaboration is still in its infancy.</p> <p>The metrics for the cow-calf and feedyard sectors are both crafted to encourage producers to institute strategies and practices that will mitigate emissions and maintain or improve soil carbon storage.</p> <p>The last two bullet points in these comments address overgrazing and water quality concerns. As the USRSB cow-calf sector actively engaged in the development of the metrics to address these issues, those cattlemen and women have identified Grazing Management Plans as the primary focus for cattle producers to select management practices that are most appropriate for their operation based on their regional climate and location, and prioritize where it makes the most sense for them to focus on further improving their operations. This emphasis on GMPs will help improve pasture management, water quality, soil health and wildlife habitat. Similarly the feedyard sector chose a water resource management strategy as the most appropriate metrics for feedyards to have the flexibility to address their specific water resource challenges.</p>
34	<p>3. Is there any interest in adding other animal protein species? Sheep? Goats? Bison? Many of the same entities (producers and killer/fabricators) are engaged with these species as well.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB. At this current time, the USRSB is only focusing on the beef industry and value-chain.</p>
35	<p>3. Lack of effective incentives or meaningful performance measures. The framework fails to specifically address how the USRSB will enable individuals and corporations to purchase beef that meets credible higher-sustainability standards and reward producers committed to minimizing the negative environmental impacts of their operations. Without well-designed economic incentives, the USRSB framework will fail to support market demand for sustainable beef and cannot encourage beef producers to implement more sustainable practices. Reducing environmental impacts of production, particularly those that harm endangered species, water quality and the climate, would signify a substantive move toward sustainability. However, without effective incentives and a competitive marketplace that rewards sustainability (e.g., with premium pricing and purchasing preferences), the USRSB fails to associate financial benefits with environmental protection. This severely hamstrings the potential adoption of sustainability standards by producers and customers and immediately sets up the entire framework to fail. To address these shortcomings, the USRSB should encourage buyers to offer producers in their supply chains price premiums and purchasing preferences, and provide resources that more effectively enable producers to implement better management practices. Rewarding beef producers for practices that generate improvements in soil health, water and air quality, habitat quality and biodiversity, and heat-trapping pollution is essential for motivating producers to buy into the program. The USRSB should replace practice-based metrics with results-based ones. Metrics based on results verify not just the existence of a grazing plan, for example, but benefits of its full implementation. Measurable outcomes serve as more credible indicators of actual progress in reducing environmental harms. The USRSB should additionally provide producers with real-world examples that show the financial benefits of increasing sustainability and link profits and productivity with</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Engagement in business-to-business ventures is out of scope for the USRSB. However, the USRSB is committed to continual improvement in the Framework, and the USRSB will update, as needed, the comprehensive Sustainability Framework inclusive of High Priority Indicators, metrics for each sector, sustainability assessment guides, tools and resources.</p>
36	<p>3. Seedstock producers such as Leachmans of Colorado and others should be members of this organization. Since ranchers are really only producers of someone else's genetics, their role in understanding cow/calf, feedlot and consumer demands is critical.</p>	<p>The USRSB will reach out to the Leachmans to discuss membership opportunities.</p>
37	<p>3. The USRSB framework's indicators, metrics, and SAGs are vague, weak, and inadequate for reducing and minimizing impacts and enabling vitally needed progress. Even if the structural issues are addressed, the USRSB's metrics fail to scientifically evaluate progress in reducing key impacts of beef production, including: surface, groundwater and air pollution; the climate crisis; the rise and spread of antibiotic resistant bacteria; and harm to fish, wildlife and biodiversity. Most of the USRSB's indicators and metrics do not focus specifically on reducing impacts. Instead, the metrics tend to be practice-based rather than results-based (mostly verifying the mere development of a grazing or nutrient management plan "or equivalent," not focused on its outcomes or even its implementation details). In that sense, the metrics fail to serve as credible indicators of whether plans were effectively implemented and generate genuine improvements for America's lands, air, water, and communities. Their vagueness—coupled with the lack of meaningful performance measures—raise major doubts that the USRSB's sustainability framework will produce significant improvements to livestock management.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. The metrics were designed to achieve maximum progress across all the indicators in the sector. As a voluntary effort, some guiding criteria in developing the metrics were that producers understand them, know how to begin to implement them (and improve on them over time), and that they are economically and technologically feasible. The practice-based metrics selected are scientifically proven to be able to positively impact sustainability outcomes, while having the best chance of being widely accepted (and implemented) on the ground. Choosing something more prescriptive may be better in some stakeholders' eyes, but would have minimal if not non-existent impact because they would have very minimal uptake and implementation.</p>
38	<p>4. As the metrics evolve, it will be important to continue to provide more direction on how companies track continuous improvement. Even if we answered "yes" to all of the questions, there would be a lot of work to do to deliver on the commitments (e.g. AHW policies, GHG reductions, etc.). A way to track achievements of significant milestones could 1) provide motivation and recognition to roundtable members and 2) increase the credibility of the USRSB framework.</p>	<p>Based on your comment, we have made some clarifications through the addition on an introduction section outlining the process we have followed and will follow in the future. We will take your points into consideration as we continue to develop the Framework.</p>
39	<p>4. Efficiency. Efficiency has been widely used as a sustainability proxy, with greenhouse gas emissions being expressed on a per unit of meat basis. The feedyard section on efficiency is extremely detailed, discussing specifics of genetic selection and useful technologies (i.e. ionophores and growth promotants). However, the framework would be remiss not to mention the current scientific discourse regarding utilizing efficiency as a measure of sustainability. While many synergies do exist, efficiency measures largely fail to account for many other aspects of sustainability (for example, the land-use tradeoffs, water quality, etc.) and may incentivize higher production. This paper (https://onlinelibrary.wiley.com/doi/abs/10.1111/gcb.14321) is a good resource for a more detailed discussion of these concerns.</p>	<p>We will review this paper and determine its relevance in this framework.</p>
40	<p>4. Endorse and form partnerships with independent third-party certifiers of beef cattle products. To make credible "sustainable" marketing claims, we encourage USRSB to use and/or endorse the best, most credible approach: partnerships with independent third-party auditing and certification organizations such as A Greener World, American Grassfed Association (AGA), USDA Organic Certifiers, Food Alliance, the Grasslands Alliance, and Predator/Wildlife Friendly. We encourage major supermarkets, restaurant chains, and beef brands to purchase a growing percentage of their beef from independent third-party certified sources over the next 5-10+ years (e.g., 25% within 5 years, 50% within 10 years, 100% by 2050). Such partnerships can use comprehensive sustainability standards not just for certification, but also as tools to guide continuous improvement on the journey to and beyond certification.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. USRSB has a program evaluation committee tasked with evaluating the equivalency of business-to-business programs against the USRSB Sustainability Framework. USRSB encourages these programs to utilize the Framework.</p>

41	<p>4. Failure to create an action plan to change beef industry policy positions that block efforts to reduce environmental impacts or otherwise advance sustainability. For years the powerful corporate members in the USRSB have worked to undermine environmental protections at the federal and state level. They have done so by pushing to weaken regulations for clean air and water, suppress right-to-know laws that would protect communities and evade fines and legal responsibility for pollution. These major corporate players must stop aggressive attempts to weaken or eradicate federal and state protection for the environment. The USRSB framework should support protections set in place for the best interest of clean air, clean water and healthy ecosystems. The organization and its members have a powerful opportunity to serve as vehicles for change rather than continue to undermine efforts to curtail environmental transgressions caused by the industry. One way the USRSB can move in this direction is to stand against the House Farm Bill that is intended to severely cripple major environmental protections, particularly trespassing against the rights of states to pass further environmental protection laws. The USRSB should instead support additional funding for conservation incentive programs and environmental protections in the Farm Bill, which will in turn support producer transitions to more sustainable management practices. Other major demonstrations of seriousness about sustainable practices include: Demanding transparency and data collection for emissions generated by livestock production, Supporting enforcement of the Clean Water Act, Supporting strengthening of the Waters of the United States rule, and Supporting existing and improved legal protections for America's natural heritage of native wildlife and biodiversity. Finally, the USRSB should reject the policy structures that provide excessive subsidies that allow the majority of beef producers to externalize the impacts of poor land and livestock management to the planet, people and animals while</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Regulatory affairs and legislative lobbying are out of scope for the USRSB.</p>
42	<p>4. How far into "input streams" do you suggest feeders delve when evaluating their impacts to land and water? To illustrate, there is a difference in several environmental impacts between feeding a steer in Idaho heavily glyphosated grains from farms in Iowa vs. feeding local, less biocided grains from nearby Twin Falls.</p>	<p>The USRSB and Field to Market have entered into a collaboration agreement to explore how the two sustainability initiatives can jointly work together to address feed sustainability. This collaboration is still in its infancy. We recognize the importance of addressing feed sustainability and look forward to making progress in this space through our collaboration with Field-to-Market.</p>
43	<p>4. USRSB corporate members should stop working to weaken, eliminate or otherwise undermine federal and state protections for America's environment, climate, public health, animal welfare, workers and producers. A credible sustainable beef framework should seek to support federal and state protections that safeguard America's natural resources (e.g., air, water, soil, habitats and biodiversity), prohibit routine uses of antibiotics, and provide a fair economic return for producers, fair wages and safe conditions for workers, and higher animal welfare. If USRSB industry leaders and stakeholders are serious about sustainability, the USRSB should use its clout to address key policy needs to advance sustainability. These include:</p> <ul style="list-style-type: none"> - strengthening and enforcement of GIPSA rules - eliminating the use of medically important antibiotics for purposes other than treatment of animals diagnosed with an illness, medical or surgical procedures, or to control an identified disease outbreak. - supporting federal and/or state legislation requiring tracking of medically important antibiotic use and publicly reporting collected data on an annual basis. - adoption of the organic animal welfare rule. - banning hormones and growth promoters, including beta agonists. - opposing increases in speed of the lines in processing plants. 	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Regulatory affairs and legislative lobbying are out of scope of the USRSB. Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship. The Sustainability Framework is meant to support and be adaptive to all types of beef production systems.</p>
44	<p>4. USRSB corporate members should stop working to weaken, eliminate or otherwise undermine federal and state protections for America's environment, climate, public health, animal welfare, workers and producers. A credible sustainable beef framework should seek to support federal and state protections that safeguard America's natural resources (e.g., air, water, soil, habitats and biodiversity), prohibit routine uses of antibiotics, and provide a fair economic return for producers, fair wages and safe conditions for workers, and higher animal welfare. If USRSB industry leaders and stakeholders are serious about sustainability, the USRSB should use its clout to address key policy needs to advance sustainability. These include:</p> <ul style="list-style-type: none"> - strengthening and enforcement of GIPSA rules - eliminating the use of medically important antibiotics for purposes other than treatment of animals diagnosed with an illness, medical or surgical procedures, or to control an identified disease outbreak. - supporting federal and/or state legislation requiring tracking of medically important antibiotic use and publicly reporting collected data on an annual basis. - adoption of the organic animal welfare rule. - banning hormones and growth promoters, including beta agonists. - opposing increases in speed of the lines in processing plants. - opposing the Farm Bill provisions originally proposed in the House Agriculture committee bill that eviscerate key conservation programs and gut environmental enforcement and states' rights to pass human health, environmental, and animal welfare protections. - supporting increased conservation funding in the Farm Bill to enable greater technical assistance and support for producers. - increases in the minimum wage for workers - increased transparency and data collection including toxic emissions generated by CAFOs. - strong enforcement of existing Clean Water Act protections. Many states lack adequate funding for enforcement of existing Clean Water Act protections. The beef industry should stop combating these protections and work with stakeholders to develop well-crafted and effective pollution-reduction solutions where needed. ☑ strong enforcement of existing protections for America's native fish, wildlife and plant biodiversity, especially endangered species and habitats; 	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Regulatory affairs and legislative lobbying are out of scope of the USRSB. Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p>
45	<p>4. Weak performance measures set a low bar, open the doors to greenwashing, muddy the waters of "sustainable" beef marketing claims and undercut efforts to recognize and reward credibly more sustainable producers and brands. The USRSB's failure to establish meaningful performance measures raises serious questions about the industry's use of the term "sustainable." We are concerned that the framework's vague and weak indicators and metrics create an unacceptably low bar that will water down the meaning of real "sustainable" beef in the U.S. marketplace. What is bought and sold as "sustainable" by the beef processors will be a cheap imitation of a truly sustainable product. The USRSB's weak approach could foster confusion by clouding the ability of beef buyers to tell the difference between credibly sustainable producers and brands and those whose marketing claims are greenwash. Weak "sustainability" claims undermine the promising rise of independent third-party certified and other credibly "sustainable" and "regenerative" producers—who deserve to be rewarded with more business and better prices given the valuable ecosystem services that well-managed ranches and farms provide to society. While the USRSB claims that it "will not mandate standards nor verify individual stakeholder performance," participating retailers and other major buyers will likely use these indicators and metrics to develop purchasing guidelines. We are concerned that the "sustainable" label will then be used to demand higher prices from consumers, when in fact that beef will result from, at best, bare minimum practices because the processors will not pay for more and producers cannot afford to do more. Purchasing standards based on this USRSB framework will be unacceptably weak. As a result, if beef produced on operations that have adopted these metrics is marketed or promoted in any way as "sustainable" (as Cargill and McDonald's have been doing in Canada), our coalition will continue to publicly call out the USRSB framework as greenwashing. We will soundly reject and expose any retailer that bases a "sustainable" claim on these vague, weak metrics and ineffectively designed "sustainability" framework.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p>

<p>41 https://www.huffingtonpost.com/andrew-gunther/livestock-antibiotics_b_1392735.html 42 http://www.sustainabletable.org/257/antibiotics 43 https://www.cgdev.org/article/non-therapeutic-use-antibiotics-animal-agriculture-corresponding-resistance-rates-and-what 44 http://www.pewtrusts.org/en/projects/antibiotic-resistance-project/about/antibiotic-use-in-food-animals 45 https://consumersunion.org/news/the-overuse-of-antibiotics-in-food-animals-threatens-public-health-2/ 46 https://www.theguardian.com/environment/2017/aug/01/meat-industry-dead-zone-gulf-of-mexico-environment-pollution 47 http://www.academia.edu/14150486/Milking_Natures_Bottom_Line_A_Full-Cost_Accounting_of_Proposed_CAFQ_Operations 48 https://www.jstor.org/stable/2641971?seq=1#page_scan_tab_contents 49 http://culter.colorado.edu/~tims/Leleune2001.pdf 50 https://www.ucsusa.org/food_and_agriculture/our-failing-food-system/industrial-agriculture/the-rise-of-superweeds.html#.WzP_oNKWwwl 51 https://www.npr.org/sections/kruhwich/2012/11/29/166156242/cornstalks-everywhere-but-nothing-else-not-even-a-bee 52 https://www.sciencedaily.com/releases/2015/04/150402081619.htm 53 https://www.hsph.harvard.edu/news/press-releases/colony-collapse-disorder-pesticide/ 54 https://www.nytimes.com/2012/03/30/science/neocotinoid-pesticides-play-a-role-in-bees-decline-2-studies-find.html 55 https://ensia.com/voices/gmos-silver-bullets-and-the-trap-of-reductionist-thinking/ 56 https://ensia.com/voices/gmos-silver-bullets-and-the-trap-of-reductionist-thinking/ 57 http://www.conservationmagazine.org/2010/08/sea-sick/</p>	<p>Thank you for providing these resources.</p>
<p>47</p> <p>5. Animal Welfare. A discussion of animal welfare within a sustainability context has largely been absent. Therefore, it is very promising that USRSB has chosen to include it as a key pillar to the sustainability framework. However, substantial improvements are required to ensure that it positively impacts animal welfare. Currently, the animal welfare sections rely heavily on basic animal health and efficiency as positive indicators of overall welfare- neither of which are reliable to determine animal welfare, especially at the herd level. The science of animal welfare and behavior has spent years determining sound measurements and indicators, including the 5 freedoms and the 3 circles model (please see in-line comment for specific resources). Additionally, science proves that assuming animals producing efficiently must be in good welfare is not accurate. This section needs to be greatly improved and scientifically based in the science of animal welfare and behavior to adequately address this issue.</p>	<p>During the process of identifying the 6 high priority indicators that the USRSB members engaged in the fall of 2014 and spring of 2015, it was clear to the value chain that animal welfare (Animal Health & Well-being) must be included as one of those top priorities. As part of the metric development process with the roundtable, the cow-calf, auction market and feedyard sectors identified the Beef Quality Assurance Program and the Cattle Care and Handling Guidelines as the focal point for cattlemen and women to address the Animal Health & Well-being indicator.</p>
<p>48</p> <p>5. Failure to address limitations of grass-fed production. The USRSB must strive to address false solutions to concerns about the environmental impact of the beef industry. Most prominently, grass-fed beef, which is trending in the more privileged sectors of society, can cause serious environmental problems. Despite the hype, grass-fed beef is poorly regulated. The idea that current levels of beef production could be met through grass-finished production is misleading. While there may be some benefits of grass-fed over grain finished beef (particularly reducing animal welfare impacts of confinement and threats to the viability of medically important antibiotics), it takes about five times more water (on average) to produce than industrial beef. We simply don't have the land resources available to meet America's current demand for beef via grass-finished supply chains alone. Grazing, particularly in the arid west, has already had a devastating effect on native species, water resources, riparian areas and vegetation needed to support biodiversity and fragile ecosystems. And although grass-fed beef may seem like a more palatable option for being more humanely produced than feedlot-finished cattle, grass finishing alone fails to address the large numbers of wildlife displaced or exterminated to protect grazing cattle. The grass-fed/pasture-raised industry and its advocates almost universally ignore this and other impacts of poor grazing and ranch management. The USRSB should acknowledge the inherent unsustainability of grass-fed production at current levels of consumption as well as the threats that widespread grazing and lethal predator control present to biodiversity. It should instead create standards for grass-fed production that reflect its limitations while holding both individual producers and the sector as a whole responsible for impacts on wildlife, land, air and water sources. The Reality of Sustainable Beef Production and Consumption The proposed framework does not address any of these issues. Instead, it uses sustainability as a smokescreen to capitalize on the rising demand for sustainable food while enabling the industry to continue business-as-usual. This is misleading to the American public, a disservice to those with a real interest in sustainable food systems and a threat to the health of our environment. It is also greenwash, and the X stands prepared to call it out as such if any USRSB members use this framework to make</p>	<p>Regarding different types of beef production systems (i.e., grain vs. grass finishing) the mission and vision of the USRSB focuses on the environmentally sound, socially responsible and economically viable production of beef in the U.S., regardless of the type of production system. Each type of beef production should be evaluated under the auspices of the six high priority indicators. The USRSB guidance is intended to support and improve all forms of beef production. We have included language in the introduction section of this document to ensure that point is clear.</p>
<p>49</p> <p>5. Inadequate approach to feed production. The USRSB framework fails to specify how it will reduce the devastating impacts of feed crop production. The USRSB notes that its partner, Field to Market, will measure sustainability of feed crop production—but fails to specify which indicators Field to Market will use and how USRSB will help crop producers transition to better management practices that reduce impacts such as overapplication of fertilizers and pesticides, declines in key pollinators, and conversion of millions of acres of America's grasslands to monoculture crops. Simply stating that it is a different type of operation and relying on Field to Market to measure progress is inadequate for credibly detailing how USRSB will curtail the significant impacts of feed production for the beef industry.</p>	<p>The USRSB and Field to Market have entered into a collaboration agreement to explore how the two sustainability initiatives can jointly work together to address feed sustainability. This collaboration is still in its infancy. We recognize the importance of addressing feed sustainability and look forward to making progress in this space through our collaboration with Field-to-Market.</p>
<p>50</p> <p>5. USRSB corporate members should stop working to weaken, eliminate or otherwise undermine federal and state protections for America's environment, climate, public health, animal welfare, workers and producers. A credible sustainable beef framework should seek to support federal and state protections that safeguard America's natural resources (e.g., air, water, soil, habitats and biodiversity), prohibit routine uses of antibiotics, and provide a fair economic return for producers, fair wages and safe conditions for workers, and higher animal welfare. If USRSB industry leaders and stakeholders are serious about sustainability, the USRSB should use its clout to address key policy needs to advance sustainability. These include: - strengthening and enforcement of GIPSA rules - eliminating the use of medically important antibiotics for purposes other than treatment of animals diagnosed with an illness, medical or surgical procedures, or to control an identified disease outbreak.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Regulatory affairs and legislative lobbying are out of scope of the USRSB. Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p>
<p>51</p> <p>5. USRSB members should pool resources and expand technical assistance to producers. Producers urgently need more "feet on the ground" to help them implement better management systems and practices. Funding to support producer investments in management improvements and associated infrastructure is highly competitive and difficult to secure. We also strongly encourage the USRSB to publicly support increases in key Farm Bill conservation programs (including EQIP, CSP, CRP) that receive far more applications from eligible producers than can be approved.</p>	<p>Based on your comment, we have increased the quality of the resources provided. As the Framework will continue to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.</p>
<p>52</p> <p>5. USRSB members should pool resources and expand technical assistance to producers. Producers urgently need more "feet on the ground" to help them implement better management systems and practices. Funding to support producer investments in management improvements and associated infrastructure is highly competitive and difficult to secure. We also strongly encourage the USRSB to publicly support increases in key Farm Bill conservation programs (including EQIP, CSP, CRP) that receive far more applications from eligible producers than can be approved.</p>	<p>Based on your comment, we have increased the quality of the resources provided. As the Framework will continue to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.</p>
<p>53</p> <p>5. You mentioned that appropriate grazing practices sequester carbon and reduce erosion. I suggest you also mention that increased soil carbon greatly aids in water absorption and retention, which is an important consideration in the intermountain West where many of your producers are located.</p>	<p>We believe this is addressed in the description of the benefits of a GMP under the water resources indicator.</p>
<p>54</p> <p>58 https://www.ncbi.nlm.nih.gov/pubmed/19187217 59 https://www.ncbi.nlm.nih.gov/pubmed/20722248 60 https://www.motherjones.com/food/2012/02/how-factory-farms-are-killing-seals/ 61 Ibid. 62 https://www.ucsusa.org/food_and_agriculture/solutions/advance-sustainable-agriculture/integrating-crops-and-livestock.html#.WzQA2NKWwwk 63 http://www.mdpi.com/2071-1050/9/3/473</p>	<p>Thank you for providing these resources.</p>

55	<p>6. Invest in infrastructure—especially local processing facilities—that supports the growth of small and mid-scale production for local, regional and value-added markets. Currently, many producers have trouble finding slaughtering facilities willing to separate grass-fed, organic, or otherwise more sustainable beef product. Processing facilities need a critical mass of animals, so it is hard for many small producers to find local options—requiring them to travel longer distances, which increases production costs and cuts into profits.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p>
56	<p>6. Invest in infrastructure—especially local processing facilities—that supports the growth of small and mid-scale production for local, regional and value-added markets. Currently, many producers have trouble finding slaughtering facilities willing to separate grass-fed, organic, or otherwise more sustainable beef product. Processing facilities need a critical mass of animals, so it is hard for many small producers to find local options—requiring them to travel longer distances, which increases production costs and cuts into profits.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Engagement of the USRSB in business-to-business ventures is out of scope of the USRSB.</p>
57	<p>6. Land and Water. In the cow-calf section, the framework suggests developing a grazing management (GMP) plan to address sustainability concerns. While this is a first step, simply having a GMP does not ensure that it will be a good one, or that it will address sustainability. I appreciate that the framework listed references with helpful information on sustainable grazing, but the framework should address (even generally) what a well-planned GMP contains, and how ranchers can continuously monitor on their operations to achieve sustainable outcomes.</p>	<p>The Framework does generally address what a well planned GMP contains. Resources have been added that will assist producers in analyzing the needs of their operation.</p>
58	<p>6. USRSB members should pool resources and expand technical assistance to producers. Producers urgently need more “feet on the ground” to help them implement better management systems and practices. Funding to support producer investments in management improvements and associated infrastructure is highly competitive and difficult to secure. We also strongly encourage the USRSB to publicly support increases in key Farm Bill conservation programs (including EQIP, CSP, CRP) that receive far more applications from eligible producers than can be approved.</p>	<p>Based on your comment, we have increased the quality of the resources provided. As the Framework will continue to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.</p>
59	<p>6. You lump what I would call producers (cattle ranchers, mostly but not exclusively cow-calf operators) with downstream actors, including feeders. No one I know uses the term “producer” when referring to a feeder. Indeed, unless cattle are being fed under retained ownership, or the rancher owns its own feedlot, the relationship between rancher producers and every other downstream entity is an across-the-table affair – as opposed to walking down the aisle together.</p>	<p>Within USRSB, we collectively refer to those sectors in the supply chain that raise and produce cattle as “producers.” There has been good alignment with this approach, as it allows us to collectively describe and discuss topics that are cross-cutting across all of those live animal sectors. All of those live animal sectors add value to the cattle, facilitate commerce and add beef to the carcass.</p>
60	<p>64 Poletto, R. Cheng, H.W., Meisel, R.L., Garner, J.P., Richert, B.T., Marchant-Forde, J.N. (2010). Aggressiveness and Brain Amine Concentration in Dominant and Subordinate Finishing Pigs Fed the β-Adrenoreceptor Agonist Ractopamine. <i>Journal of Animal Science</i>, 88(3), 3107- 20.http://www.prairieswine.com/wp-content/uploads/2011/08/1184.full_.pdf; Poletto, R., Meisel, R.L., Richert, B.T., Cheng, H.W., Marchant-Forde, J.N. . (2009). Behavior and Peripheral Amine Concentrations in Relation to Ractopamine Feeding, Sex, and Social Rank of Finishing Pigs. <i>Journal of Animal Science</i>, 88(3), 1184- 94.https://naldc.nal.usda.gov/download/41673/PDF; Consumers International. (2012). “Comments on the Discussion Paper of the Electronic Working Group on Issues Related to Standards Held at Step 8.” (“[P]igs taking ractopamine were reported to have suffered adverse effects—hyperactivity, trembling, broken limbs, inability to walk and death.”); James, B. W.; Tokach, M. D.; Goodband, R. D.; Nelssen, J. L.; Dritz, S. S.; Owen, K. Q.; Woodworth, J. C.; Sulabo, R. C. (2013). Effects of dietary L-carnitine and ractopamine HCl on the metabolic response to handling in finishing pigs. <i>Journal of Animal Science</i>, 91(9):4426-39. At: https://www.asi.k-state.edu/doc/swine-day-2004/p158handlingxpalyeancarnitine.pdf. (stating that “Ractopamine fed pigs are leaner than counterparts not fed RAC. Increased muscling or leanness is likely to predispose the pig to greater physiological effects of stress.”); Food and Drug Administration, Center for Veterinary Medicine. Adverse Drug Effects Comprehensive Clinical Detail Listing 1/1/1987 thru 3/31/2011, Drug Listing: N thru S: 177-84. Retrieved on 15 July 2015 from http://web.archive.org/web/20110426003851/http://www.fda.gov/downloads/AnimalVeterinary/SafetyHealth/ProductSafetyInformation/UCM055411.pdf (last visited Dec. 17, 2012) (listing adverse drug effects for horses, pigs, cattle, turkeys, dogs, and humans).</p> <p>65 http://www.beefmagazine.com/processors/temple-grandin-explains-animal-welfare-problems-beta-agonists</p> <p>66 http://www.beefmagazine.com/processors/more-packers-stop-taking-zilmax-fed-cattle</p> <p>67 Kay, S.(2013). “More Packers to Stop Taking Zilmax-Fed Cattle.” <i>Cattle Buyers Weekly</i>, http://www.beefmagazine.com/processors/more-packers-stop-taking-zilmax-fed-cattle</p> <p>68 Nachman, K.E. & Smith, T.J.S. (2015). Hormone Use in Food Animal Production: Assessing Potential Dietary Exposures and Breast Cancer Risk, <i>Curr Envir Health Rpt</i>, DOI 10.1007/s40572-014-0042-8.</p>	<p>Thank you for identifying several of the references that you utilized to help formulate the comments you submitted.</p>
61	<p>7 http://news.cornell.edu/stories/1997/08/us-could-feed-800-million-people-grain-livestock-eat</p> <p>8 https://iaspub.epa.gov/tmdl_waters10/attains_nation_cy.source_wbtype_detail?p_source_group_name=AGRICULTURE&p_wbtype=STREAM/CREEK/RIVER&p_wtype_display=Rivers%20and%20Streams&p_sz_column=%20size_1&p_sz_unit=miles</p> <p>9 http://eps.berkeley.edu/people/lunaleopold/(147)%20Ethos,%20Equity%20and%20the%20Water%20Resources.pdf</p> <p>10 https://www.jstor.org/stable/1313420?seq=1#page_scan_tab_contents</p> <p>11 https://www.bigskyweeds.org/care.html</p> <p>12 http://static.ewg.org/pdf/plowed_under.pdf</p> <p>13 <a 534="" 638="" 734"="" 988="" href="https://watermark.silverchair.com/53-8-759.pdf?token=AQECACAH208BE49Ooan9khhW_Ercy7Dm3ZL_9Cf3qfKAc485ysgAAAcKwggHFBgkqhkiG9w0BBwagggG2MIIBsgIBADCCAAsGCSqGSIb3DQEHAaBglghkqBZQMEAS4wEQQM2FGLTFSJ-hoL5SeYAgEQglBFBkhh-xl8EgzHjsoPtse1tuWbrGqPba0Pye4BDKmvhg5bpgl8l9dHgXJp-Wez1nK5s2wK7MWyzaRz1uGKNUrNzma22fo55ACq2oFhpGxrXMDu64Yf81568E-sOHjCVp4dYQzP4R4rdhJh2S05fTiwogYL_DbU6wgSlpC83farp_3UyafkW7r96Tkv7MBE24cb_hl8eY068CYjVxrvh76ekdkjQZHfw2rhqFgtmrk0NeWWhx6MoxStYCCY4KHZPySLgRgCZWORXxAn6DYHq87JumBvhofsvfXsPIAoblp1WHZ_i1Vltqw54puKcvpp0HCw0j_KCVfQj0ohBnjd67uqo2iAhxUsOXu8vm4fy3z62r-4YfmxC9GzxVT9BICaVoEOmLTKv8af3ozORRM73kXwdvN8KFUotF44NARTnSL-9XnQnHtdyblDiAdct80CcEmGEI93dDqcEdxql6i9qK87WfRQ0_mvbrs1ECDBXyNo5HxwD9_yO</p> </td> <td data-bbox="> <p>Thank you for providing these resources.</p> </p>	
62	<p>7. Did you include distribution as a sector? I don't recall it. If you wish to be comprehensive, every significant entity type that is directly involved with live animals, carcasses and meat should be included. Disty is one of those sectors. Fuel consumption is enormous here and GHG and particulate emissions are as a consequence non-trivial.</p>	<p>Distribution is currently not a separate supply-chain sector, but is part of the retail/food service sector. This Framework is the first step in our commitment to continuously improving the sustainability of U.S. beef production. The high-priority indicators and supply-chain segments will be evaluated and further developed over time. The USRSB will consider adding distribution as a sector during this review process.</p>
63	<p>7. Invest in infrastructure—especially local processing facilities—that supports the growth of small and mid-scale production for local, regional and value-added markets. Currently, many producers have trouble finding slaughtering facilities willing to separate grass-fed, organic, or otherwise more sustainable beef product. Processing facilities need a critical mass of animals, so it is hard for many small producers to find local options—requiring them to travel longer distances, which increases production costs and cuts into profits.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Engagement of the USRSB in business-to-business ventures is out of scope of the USRSB.</p>
64	<p>7. Work with policy makers to create public/private investments in irrigation districts that need financial resources to improve infrastructure—particularly to offer producers flexible irrigation scheduling and pressurized water delivery, which many producers currently lack. This prevents them from scheduling irrigation during cooler times of day to minimize evaporative losses, and from transitioning to more efficient water delivery technologies.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Lobbying, regulatory affairs and engagement in business-to-business ventures are out of scope of the USRSB.</p>

65	7. Work with policy makers to create public/private investments in irrigation districts that need financial resources to improve infrastructure—particularly to offer producers flexible irrigation scheduling and pressurized water delivery, which many producers currently lack. This prevents them from scheduling irrigation during cooler times of day to minimize evaporative losses, and from transitioning to more efficient water delivery technologies.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Lobbying, regulatory affairs and engagement in business-to-business ventures are out of scope of the USRSB.
66	8. Address barriers to greater sustainability on leased lands. A significant challenge for producers who lease pasture (e.g., from private ranches, state trust lands, or federal public lands) is dealing with land tenure issues: ranchers who graze on leased lands often can't convince the landowner to invest in or allow infrastructure development associated with better management practices. We encourage USRSB to identify ways for producers who lease pasture to share benefits of sustainability with landowners.	While the USRSB will not be involved in business to business arrangements where both landowners and leasees could receive benefit, I do think we could acknowledge this challenge in the cow-calf sector to increase awareness of it. USRSB has included a discussion around this topic in the cow-calf sector
67	8. I understand the decision not to get into the standards-setting and certification / verification business. This may well have been the right decision. I will reiterate my comment made during the webinar, however, that without such standards, USRSB is constrained to be (i) an intellectual framework useful in thinking about beef industry sustainability and (ii) a resource and education portal for those involved in the various sectors of that industry or for those not so involved who nevertheless wish to know more about sustainable practices. Is that enough?	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Mandating of standards and/or verifying individual stakeholder performance is out of scope for the USRSB.
68	8. USRSB should work with partners in the insurance industry to offer (a) lower livestock loss and crop insurance premiums to producers who implement practices that improve soil health and resilience to our changing climate; and (b) lower livestock loss insurance premiums to producers who implement non-lethal practices for reducing conflicts with predators and other native wildlife. If the beef industry is truly committed to supporting a scaled-up system for sustainability, we strongly encourage USRSB to address the concerns and recommendations that we have shared above. The goal should be to develop a well-designed solution system supported by effective federal and state policies and protections that (1) incentivize, enable and sometimes mandate good and improving management; (2) offer producers extensive technical assistance and increasing benefits for better results, and thus (3) generate a "race to the top" in which major retailers and brands both use the USRSB framework to raise the floor of their beef supply chains, and purchase an increasing percentage of their beef at fair prices from independent third-party certified sustainable suppliers.	There is a brief discussion on risk management, in the Cow-Calf Sector SAG. We agree generally that there should be an expanded discussion of the benefits of risk management, which should include insurance and preparations for contingencies like drought or increasing climate variability. We will consider this expanded discussion in future revisions of the Framework document.
69	8. Work with policy makers to create public/private investments in irrigation districts that need financial resources to improve infrastructure—particularly to offer producers flexible irrigation scheduling and pressurized water delivery, which many producers currently lack. This prevents them from scheduling irrigation during cooler times of day to minimize evaporative losses, and from transitioning to more efficient water delivery technologies.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Lobbying, regulatory affairs and engagement in business-to-business ventures are out of scope of the USRSB.
70	9. Address barriers to advancing sustainability on federal public land grazing allotments managed by the U.S. Forest Service (USFS) and U.S. Bureau of Land Management (BLM). - There is an urgent need to incentivize better management of livestock grazing on federal public lands managed by the USFS and BLM. Grazing management on these lands has long been challenging for various (and often complex) reasons. This is an area ripe for innovative, incentive based solutions. - The beef industry must stop working to prevent, delay or weaken efforts to improve grazing management on federal public lands that are degraded by poor management. This issue is important because a small proportion of U.S. beef production (probably between 2-4%) (approximately 2000 operators) is negatively impacting ecosystem health, water quality, and biodiversity on 50-75 percent of public lands. - We encourage the USRSB to identify ways to support "win-win" policy solutions for public lands grazing allotments plagued by issues of concern that make livestock production increasingly challenging such as federal grazing allotments located in regions plagued by (a) increasingly frequent and severe drought and declining economic viability of livestock production, and (b) frequent conflicts with valued keystone predators (e.g., grizzly bears, wolves) that inhabit a small percent of American lands. Specifically, we urge the USRSB to support policies that offer producers in these situations the opportunity to permanently retire their grazing permits in exchange for property and grazing permits in areas more favorable for livestock production.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Additionally, regulatory affairs and legislative lobbying in out of scope of the USRSB.
71	9. Address barriers to greater sustainability on leased lands. A significant challenge for producers who lease pasture (e.g., from private ranches, state trust lands, or federal public lands) is dealing with land tenure issues: ranchers who graze on leased lands often can't convince the landowner to invest in or allow infrastructure development associated with better management practices. We encourage USRSB to identify ways for producers who lease pasture to share benefits of sustainability with landowners.	While the USRSB will not be involved in business to business arrangements where both landowners and leasees could receive benefit, I do think we could acknowledge this challenge in the cow-calf sector to increase awareness of it. USRSB has included a discussion around this topic in the introductory section.
72	9. Large multinationals like JBS, which is a USRSB member, and others import a significant amount of Brazilian beef, and Canadian and Mexican cattle and beef into the United States. Are the "offshore" raising entities in those foreign countries, whether or not owned by U.S. members, welcomed into the USRSB family? After all, if beef from their foreign-raised cattle is consumed here, they're part of the domestic beef ecosystem. In addition, impacts to air quality particularly are felt worldwide, including in the U.S.	The USRSB Sustainability Framework was developed for any operation, facility or beef that is located in the U.S. There are sustainability initiatives functioning in other countries that are addressing the sustainability challenges relevant to their specific geography, climate and landscape. We hope companies operating outside the U.S. will utilize the resources most relevant to their location, but USRSB Resources and materials will be publicly available for anyone to utilize.
73	9. Proactively reduces negative interactions with livestock and carnivores (ex. livestock carcass removal to reduce attracting carnivores to calving operations)	We have added a brief discussion on livestock and predator interactions, in the Animal Health and Well-being section.
74	A fire resilient landscape needs to be added acknowledging grazing mimics historic grazing patterns by reducing fuel loads. Fire is positive on a well managed landscape.	We have added to desired outcomes list of land resources indicator: Reduced fuel load which can reduce the risk of high-intensity wildfires. (Line 746-753)
75	A metric that works for multiple indicators is a good metric. Recognition of GMP for air and GHG, land and water makes good sense.	We appreciate your support.
76	A reduction in fuel loads that contribute to high intensity wildfires	We have added to desired outcomes list of land resources indicator: Reduced fuel load which can reduce the risk of high-intensity wildfires.
77	Actually proper grass fed operations stop soil erosion and ad more back to the soil then most crops. Plastic packaging is the real problem with food service and retail not the animals. As someone in my sixties and been in the meat industry since I was sixteen I happy to see that younger people care and are concerned about where food comes from.	The topic of plastic packaging is outside the scope of the USRSB.
78	Add...Recycling organic nutrients through crop production "to reduce the use of man-made fertilizer" man-made may not be the right word.	This clarification was made in response to your comment.
79	Add...Retaining and reusing storm water runoff "to improve water recycling capabilities"	We agree with the recommendation to highlight the importance of improving water recycling. The language has been revised to include a focus on improving water recycling capabilities.

80	Adding a sustainable beef market would help with this very important element on the cow-calf side. Again, I would say look to a future effort with the USRSB to help increase the demand.	During the indicator development process, the USRSB agreed to identify a group of six high priority indicators. When reducing the number from 13 to 6 (first round of indicator development reduced the number from 160 to 13), the group agreed unanimously that the indicators Consumer Perception, Transparency and Profitability should be considered crosscutting requirements across multiple indicators and would not be identified as one of the specific high priority indicators. In other words, the USRSB believes that profitability is foundational to all indicators. Additionally, the USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business. For food safety, similarly the group agreed that food safety was foundational for the viability of the beef supply chain, touching every facet of beef
81	Adding comments here instead of the Full Guidance Document. Line 252 - In the guidance metric box (Are growth promoting technologies used to optimize cattle performance) I would suggest you change "greenhouse gas emissions" to "air and greenhouse gas emissions. It was mentioned earlier in the document (Lines 229-23 Auction Market - Air and Greenhouse Gases2) that growth technologies "such as ionophores, hormone implants, and b-agonists reduce greenhouse gases, volatile organic compounds and ammonia emissions in beef". We need to make sure all 3 components are mentioned and not just greenhouse gases.	We have modified the framework in response to your suggestions.
82	Additional thoughts on systems that could be added to the Cow/calf sector 1. Curt Pat/Bud Williams/Temple Grandin low stress cattle handling clinics that benefit all sectors of the animal chain.	We will make our Outreach team aware of these resources.
83	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.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the process we have followed and will follow in the future that has led to the development of the by sector SAGS. Additionally, the Framework was revised for consistency across all Sectors, to the extent possible, without losing by sector relevance.
84	Adoption is a good measure of success.	USRSB agrees that the adoption of BQA principals and practices will increase animal health and well being for the cow-calf sector.
85	Again, deforestation is not a risk in the U.S.	The Retail/Food Service Sector includes U.S. based companies that have domestic and international beef supply chains. Recognizing that retail and food service providers seldom have direct influence on significant land resource impacts through their operations, the Retail/Food Service Sector's Land Resources metrics and sustainability assessment guide focuses on a company's ability to influence in its supply chain. Deforestation has been identified as a risk associated with land use change due to beef production in many international markets. Since many US retailers and food service providers have international supply chains, it is important that the retail metric address this detrimental issue. Furthermore, this is an issue shareholders are asking publicly traded companies to address in their beef supply chains.
86	Again, thank you for reiterating that best management practices vary - not just by region, but even by operation.	We appreciate your support.
87	agree and support this approach	We appreciate your support
88	Agree.	We appreciate your support.
89	Air & GHG Emissions: 8. The first question should be rephrased as follows for more clarity: "Has the company assessed its Scope 1 & 2 GHG emissions?" This would include assessing energy use. 9. 3rd question: Environmental Management Systems are designed for industrial facilities not for independent retail operations. The intent of the question could be captured with more clarity with the following revision: "Does the company have a continuous improvement system for tracking energy use and GHG emissions?" 10. The 6th question should be revised to specify reporting since measurement is a) implied in reporting, and b) the revised 1st question would capture measurement.	We agree with your suggestion to revise the Level I metric to say "Has the company assessed its Scope 1 & 2 GHG emissions?" and have made that change. We have changed the first metric in Level II to say "Does the company have a plan to reduce its scope 1 and 2 GHG emissions?" We appreciate your suggestion to remove the word "measurement" in the first Level III metric as reporting implies measurement has taken place. We have incorporated this recommendation as well.
90	Air and GHGs: The metric is "Are strategies in place to manage air and greenhouse gas emissions (GHGs)?" a. This metric will fail to measure whether feedyards are reducing and minimizing air and greenhouse gas emissions to their potential. First it is practice based, which has the limitations noted above. b. Second, the metric merely asks whether strategies are in place to "manage" air and greenhouse gas emissions, when the goal should be to "reduce and/or minimize" emissions. Without making this change, the metric is vague, weak, and overall inadequate for measuring whether feedyards are doing their part to solve the climate crisis. c. Third, the guidance recommends use of hormones and beta-agonists to reduce time to slaughter and thus lifecycle enteric methane emissions, without noting the controversy surrounding these technologies. Credibly sustainable beef operations that take into account human health and animal welfare concerns do not rely on the use of hormones or beta-agonists for growth. One popular Beta Agonist, Ractopamine, has been banned in 160 countries and is linked to major health and behavioral concerns in animals such as cardiovascular stress, muscular skeletal tremors, increased aggression, hyperactivity and acute toxicity. ⁶⁴ As Temple Grandin noted in an article about a second Beta Agonist, Zilmax ⁶⁵ , "Tyson announced it would stop buying cattle fed the beta-agonist Zilmax TM " because some animals at its packing plant were "unable to move and had difficulty walking." Other meatpackers later announced ⁶⁶ they would no longer accept cattle fed Zilmax as well. ⁶⁷ The use of hormones to promote faster growth in animals is also of grave concern. Environmental exposure to hormones-even at low levels-have shown negative reproductive and other healthy concerns. For example some studies found links between Zeranoin intake and increased breast cancer risk. ⁶⁸ For these and other reasons Europe has banned the use of hormones in beef production. d. Overall the guidance merely provides a list of links to resources for improving manure management (including storage and application), and notes that it is "not intended to be an exhaustive list". It relies on individual operators to click through all these links to find solutions that they can implement. This is really all the USRSB can do to support feedlot operators in reducing their air and GHG emissions? Certainly USRSB can do better in illustrating options of how BMPs can reduce the impacts of poor manure management.	Based on your comment, we have added language in an introductory section discussing the mission and scope of USRSB along more discussion around our processes. Included in that introductory section is a discussion of USRSB's position on technology and different production practices. The feedyard metric for Air & GHG was reviewed by the feedyard sector members and revised to provide greater clarity in the metric question itself and in the sustainability assessment guide. Added additional links to more information for producers on Air & GHGs and management practices, including manure related emissions.

91	<p>Air/Greenhouse Gas Emissions (GHGs): The indicator is, "The cumulative emissions of pollutants, including particulate matter, greenhouse gases and other gaseous emissions from a sector for each process." The metric for this indicator is "Has a grazing management plan (or equivalent) been implemented to protect or improve soil and plant community health, including soil carbon sequestration."</p> <p>a. Guidance materials fail to include various strategies for reducing enteric methane emissions. This is an important omission because an estimated 80% of beef's enteric methane emissions occur during the cow-calf phase¹⁷.</p> <p>b. In addition, the metric fails to provide advice on cost-effective means to track improvements in carbon sequestration either on ranch (e.g., using a simple proxy like soil aggregate stability), or at larger spatial scales (e.g., using remote monitoring technologies). While carbon sequestration rates vary considerably depending on multiple factors (e.g., climate, soils, topography, land use history, management quality), a recent study¹⁸ found that one well-managed pasture based system (in the Upper Midwest) generated no net emissions of greenhouse gasses. Given the many valuable benefits of carbon sequestration¹⁹ (it is important for not just GHG mitigation, but also soil health, grass productivity, and drought resilience), the framework should connect operators with means to measure continuous improvement in above and below-ground carbon sequestration.</p> <p>c. The language, "to protect or improve" merely indicates intention and thus does not serve as a reliable indicator of air resource health. It should be changed to "that protects or improves."</p> <p>d. The framework contains no explicit information on how to plan for predicted climate changes for a ranch's location. The guidance materials on contingency planning are important, but should include resources that enable producers to identify predicted climate changes in their location.</p>	<p>a. The USRSB has chosen to focus on the implementation of grazing management plans for this indicator as enteric methane mitigation is addressed in the efficiency & yield metric (mitigation via production efficiency and nutrition), and language has been added (beginning on line 831) that directs the reader to more comprehensive, refereed literature reviews on the mitigation of enteric methane emissions. Additionally, language has been added at the beginning of the document highlighting the findings of a life cycle assessment of U.S. beef and the relative contributions of the different segments of the supply chain to impact categories such as climate resiliency.</p> <p>b. As mentioned in the comment, accurate measurement of carbon sequestration is not well understood by the academic community and measurement accuracy is largely dependent on climate and region. The USRSB would be interested in supporting pilot projects in this field of study, but does not feel confident providing overly prescriptive measurement technique guidelines until the scientific evidence for specific guidelines support is more robust.</p> <p>c. Changed as suggested. Amend metric to read "Has a grazing management plan (or equivalent) been implemented that protects or improves soil and plant community health, including soil carbon sequestration?"</p> <p>d. Indeed, climate change and variability is a key risk cattle producers will face in the years ahead. Site-specific, long-term predictions of climatic changes that can help producers' adaptive management plans are currently lacking or apply to wide geographic regions. However, two resources have been added to the "Resources for evaluating or developing a grazing management plan" section, and additional sources will be added as they become available in the future as this is intended to be a living document.</p> <p>Added resources: National Weather Service: Climate Prediction Center. Available at: http://www.cpc.ncep.noaa.gov/ National Climate Assessment. 2014. Agriculture. Available at: https://nca2014.globalchange.gov/report/sectors/agriculture http://grasscast.agsci.colostate.edu/</p>
92	<p>all cattle men and women should have the final say of how they wish to raise there cattle for what works for one person will not work for another,,, the producer for the most part takes better care of the land and cattle than what is know by the general public (City folks) the type of grass, cattle etc.. they care to raise is up to the individual person,,, not someone sitting behind a desk pushing a pencil, especially one that has never been on a farm or one that grew up on one and left for the big bucks in the city. it does not take long to be out of the farming or ranching life to loose contact with what is happening.....</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Currently, more than fifty percent (50%) of the USRSB membership are producer or producer associations. To date, cattle producers have been very supportive of the effort and are looking at the USRSB Framework as a resource for producers who are looking for continuing opportunities on how to improve their operations overall. It is and will remain a voluntary effort to help improve the sustainability of U.S. beef</p>
93	<p>Also a desired outcome would be improved range or pasture health for cattle and wildlife.</p>	<p>We have revised language in the GMP section to account for this point.</p>
94	<p>America urgently needs a more sustainable beef industry. This means ensuring that ranchers, farmers, and workers are paid fairly for their time and products, and producers are encouraged and supported to implement better management systems and practices. While we acknowledge your intentions to improve beef production practices, we stand strongly opposed to this framework and initiative in its current form because it does not meaningfully advance sustainability goals. We urge USRSB to change course.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p>
95	<p>Animal Health & Well-Being: 6. Antibiotic use and antimicrobial resistance is a key sustainability issue for the beef industry to address. The USRSB metrics and sustainability framework is an important tool for driving progress to reduce the need for antibiotics in beef production. We would like to see clearer leadership from the Feedyard Sector on this important issue.</p>	<p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p>
96	<p>Animal health and welfare and antibiotics use: We are especially concerned with the USRSB's materials regarding antimicrobial use. The framework does not acknowledge the need to reduce antibiotic use and to eliminate routine uses of medically important antibiotics for growth promotion and disease prevention purposes. We are particularly disappointed that USRSB merely "discourages" subtherapeutic antibiotics uses and includes "disease prevention" as an accepted use of antibiotics. Thus, the USRSB's "sustainability framework" will worsen, not help solve, the beef industry's overuse of antibiotics, which threatens the viability of critical human medicines.</p> <p>The spread of antibiotic resistance, which is directly tied to antibiotic use both in human medicine and animal agriculture, is an urgent public health crisis that threatens to reverse the public health gains of the last century. While the USRSB document includes fourteen recommendations on antimicrobial stewardship as the indicator for animal health and welfare that would be good to implement, they do not go far enough.</p> <p>In addition, the proposed metrics for animal health and welfare do not specifically refer back to the indicator and instead focus on a variety of animal health related activities in the Beef Quality Assurance Program including a few related to antimicrobial stewardship. These metrics should clearly refer back to the fourteen recommendations in the indicator and include some measure of whether or not they are being followed and being effective in reducing inappropriate antibiotic use. Any attempt to address the sustainability of antibiotic use must include tracking antibiotic use per animal produced and include specific indicators related to numbers and/or percent of animals treated. Most feedlots feed the first-line medically important antibiotic, tylosin, to all cattle for the entire feeding period to reduce liver abscesses that result from inappropriate high-energy diets. This practice contradicts multiple recommendations in the list, so there should be metrics that measure how this and other practices inconsistent with the indicator are curtailed and eventually eliminated</p>	<p>Antimicrobial stewardship within the beef value chain has and will continue to be an important issue. The value chain relies extensively on FDA review and approval of antimicrobials for use in cattle production that is managed under the supervision of a veterinarian within a veterinarian-client-patient relationship (VCPR). The focus on "disease prevention" within the sustainability framework is on a herd health plan that includes cattle management practices and the selection of tools and technologies that are most appropriate for the cattle being managed.</p> <p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p> <p>While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level is most appropriate for them.</p>
97	<p>Animal Well-Being: Line 444 - may be helpful to define USDA non-compliance. USDA Actions of NOIE and Suspensions are public facing. NR's and MOI's, however, are only available by FOIA request.</p>	<p>As per your suggestion, a description of USDA non-compliance has been added.</p>
98	<p>Annual, bi-annual, or seasonal reviews? Would be stronger if state how often and defensible reason for the timing of reviews. For instance, in a place where cattle summer on allotments and winter on home ranch reviews could be scheduled on a temporal and spatial scale. Also stronger if you have identified a review process (protocol) to follow. If you have, I would state it here or if this will be an outcome of pilot studies than acknowledge this will be developed in pilot studies.</p>	<p>The cow-calf sector included a suggestion to monitor and evaluate their GMP, but stopped short of providing a prescriptive standard because of the unique characteristics of ranches across the country. Clarification around pilot projects has been provided in the introductory section.</p>

99	Another criteria for success could be development of a sustainable beef market at the scale needed for the demand end to offset the costs of cow-calf operations to add this to their management plan. Sustainable beef label could meet the 6 indicators and depending on the level that was met by each member of the supply chain, could see an increase in the price for the product.	During the indicator development process, the USRSB agreed to identify a group of six high priority indicators. When reducing the number from 13 to 6 (first round of indicator development reduced the number from 160 to 13), the group agreed unanimously that the indicators Consumer Perception, Transparency and Profitability should be considered crosscutting requirements across multiple indicators and would not be identified as one of the specific high priority indicators. In other words, the USRSB believes that profitability is foundational to all indicators. Additionally, the USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business. For food safety, similarly the group agreed that food safety was foundational for the viability of the beef supply chain, touching every facet of beef
100	As a family owned ranch organized as a legal entity we hope one of the primary challenges facing sustainable business has been addressed through prior estate planning and continuous updates to the plan. This ensures continuity to the next generation which allows for the work of one generation to be improved upon by the next without the threat of disorganization as a result of untimely death. Upon that foundation our operation has put the basics, monitoring and timing, into an overall grazing plan designed to address a whole host of environmental factors from weather to wildlife and certainly livestock. The grazing plan is then incorporated into an overall ranch operation that includes adoption of such measures as BQA for livestock and assorted ranch improvements such as new fencing..	We appreciate your support.
101	As a small cow/calf producer, I & my family would like to thank everyone involved in this effort for their hard work & visionary efforts on this project. By being proactive & cooperative throughout all segments of the beef supply chain, we have the opportunity for progressive outreach to our consumers and help ensure beef stays in the center of the plate for decades to come. I greatly appreciate the wide scope & detail of this document. It provides an overview of each sector, while explaining to readers their differences. Within each sector, I was pleased to see key points, with defined goals & recommended steps to achieve objectives. Overall a great road map for consumers to understand how each segment in the supply chain is involved & working to ensure sustainability for all parties, while delivering the world's greatest protein to their dinner tables. Thank each of you again for your efforts on this project. Clint Berry - Gainesville, Missouri	We appreciate your support.
102	as I stated in my last comment... the small 1 to 50 head cattleman will be gone if things don't change.....	During the indicator development process, the USRSB agreed to identify a group of six high priority indicators. When reducing the number from 13 to 6 (first round of indicator development reduced the number from 160 to 13), the group agreed unanimously that the indicators Consumer Perception, Transparency and Profitability should be considered crosscutting requirements across multiple indicators and would not be identified as one of the specific high priority indicators. In other words, the USRSB believes that profitability is foundational to all indicators. Additionally, the USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business. For food safety, similarly the group agreed that food safety was foundational for the viability of the beef supply chain, touching every facet of beef production, processing, distribution and consumption. Additionally, based on your comment, we have increased the quality of the resources provided. As the Framework will continue to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.
103	As mentioned in the climate section:Another criteria for success could be development of a sustainable beef market at the scale needed for the demand end to offset the costs of cow-calf operations to add GMP. Sustainable beef label could meet all of or a portion of the 6 indicators and depending on the level that was met by each member of the supply chain, could see an increase in the price for the product.	During the indicator development process, the USRSB agreed to identify a group of six high priority indicators. When reducing the number from 13 to 6 (first round of indicator development reduced the number from 160 to 13), the group agreed unanimously that the indicators Consumer Perception, Transparency and Profitability should be considered crosscutting requirements across multiple indicators and would not be identified as one of the specific high priority indicators. In other words, the USRSB believes that profitability is foundational to all indicators. Additionally, the USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business. For food safety, similarly the group agreed that food safety was foundational for the viability of the beef supply chain, touching every facet of beef
104	As much of the labor on farms and ranches is by family members, is there need to call that out, specifically?	We have added a sentence to the description of indicator and metric section. "Importantly, on many farms and ranches, family members are the only "employees." Often, these family members have grown up with stockmanship principles as a part of their everyday routine; nevertheless, stockmanship and safety should always be kept top of mind and additional training should be sought whenever possible."
105	As with grazing operations, it is important to systemically identify the most serious feedyard phase impacts and options of BMP solutions to each. Top impacts that are not effectively addressed by the USRSB sustainability framework include:25 - Surface and Groundwater pollution: Feedlots – including and beyond beef – account for an estimated26 55% of sediment pollution and 30+% of nutrient pollution in America's drinking water. Inadequately sealed and maintained manure runoff catchment and storage lagoons pollute thousands of miles of waterways27 and leak into aquifers28. This pollution, along with runoff from farms that over-apply feedlot manure to crop fields (or apply it at the wrong time), may contain pathogens and harmful chemicals29 including pesticides, antibiotics, hormones, and heavy metals. Nutrient pollution attributable to feedlots also occurs when they source feed from farms that over-apply fertilizer, further contributing to aquatic dead zones30. - The Climate Crisis: Beef feedlots contribute to climate disruption31 via emissions of heat-trapping enteric methane (from cattle belching), manure methane (from storage lagoons), and nitrous oxide (from stored and applied manure and, indirectly, from over-applying fertilizer to the feed crops32 they rely on). Additional sources of heat-trapping pollution include carbon dioxide from 1) agrochemical production, 2) soils by conversion of native ecosystems to feed croplands33, and 3) poor management of feed crops34 (e.g., by degrading soils35). - Air pollution: Decomposing manure produces 160+ different gases36. Odorous volatile organic compounds (VOCs) such as hydrogen sulfide and ammonia cause profound health impacts37 to agricultural communities. Other pollutants include particulates and pathogens. Studies of communities near feedlots document38 increased rates of depression, anger and fatigue. People living next to a low feedlot39 had high rates of breath shortness, nausea, dizziness, and headaches. This pollution causes severe economic impacts. One study determined that Missouri CAFOs have lowered property values in surrounding communities40 by an average of \$2.68 million.	The USRSB has identified six high priority sustainability indicators which are covered extensively in the sustainability framework and address water, land and air resources, as well as animal health and well-being. For each sector of the value chain, we have identified metrics and resources to help individual operations continuously improve over time.

106	<p>B. Comments on the US Roundtable on Sustainable Beef's "Sustainability" Framework- Feedyard Phase Serious Impacts Require Serious Action The beef industry's concentrated animal feeding operations, which pack together thousands of animals in tightly confined spaces, cause severe impacts: - surface and groundwater pollution (by nutrients, pathogens, pesticides, heavy metals, and pharmaceuticals); - aquatic dead zones that deplete fisheries and harm fishing communities; - heat-trapping pollution that worsens the climate crisis; - air pollution, including highly toxic gases such as ammonia and hydrogen sulfide, stomach-turning odor and particulate matter that sickens workers and families and reduces property values in neighboring communities; - inefficient water use and freshwater depletion; - an overreliance on antibiotics to manage health problems created by grain-based diets and unhealthy conditions, fueling the dangerous rise of antibiotic-resistant "superbugs"; - land conversion of native prairie to monoculture feed crop fields, reducing habitat and releasing millions of tons of carbon; - declines in pollinators and predators of pests due to excessive use of toxic pesticides, particularly to genetically-modified feed crops; - poor working conditions and - inhumane treatment of animals.</p>	<p>The USRSB has identified six high priority sustainability indicators which are covered extensively in the sustainability framework and address water, land and air resources, as well as animal health and well-being. For each sector of the value chain, we have identified metrics and resources to help individual operations continuously improve over time.</p>
107	<p>Because the beef industry producers are independent and largely not responsive to top down management; edicts, rules and demands will not be effective means of achieving positive change and results in this sector of the industry. What does work to promote positive change is economics, quality of life factors, and product quality assessment. I applaud the recognition of the independent producers choice in participation and further development of USRSB. As guidelines and benchmarks are further developed and tested, there are sure to be issues. However, I believe starting the process by including everyone is very important in finding the future refinement of enhanced participation through clearer and narrower metrics.</p>	<p>Thank you for your support.</p>
108	<p>BRING BACK C O O L (country of origin labeling) Until this is done the U.S. market is in trouble and the rancher and farmer is in trouble also... The people that do not know what is really happening in the farm or ranch need to come out and work for 30 days and live off what we live off, then they can go back to what ever city they live in and fuss and complain how we do things... I don't tell them what they are doing wrong where the live!</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Additionally, regulatory affairs and legislative lobbying in out of scope of the USRSB.</p>
109	<p>C O O L needs to be enforced in this country. there is too much beef that is being sold to the U.S.A. and other countries that is not U.S.A. beef. If the consumer of all beef product really knew where their beef came from and what it was feed they would not buy beef... C O O L Country of Origin labeling helped the cattleman out when it was active, Now the spread between the cattleman and the packer is the most it has ever been, the packers and big boys are damning the little guy...if this does not change the cattleman with 1-50 head of cows will be gone, and the 50-250 head will be close behind them.... we as Americans need to protect each other not harm each other...Selling our packing houses to foreign countries that have an interest in the cattle market, and are inflecting the law makers and congress... what a bunch of Bull.... I step in enough of it when I am working cattle... but to be feed it by someone is not good. and until we as Americans I express Americans change how the market is being handled by the packer we are in trouble....</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Additionally, regulatory affairs and legislative lobbying in out of scope of the USRSB.</p>
110	<p>Carbon sequestration is a particular interest of mine as a possible means of helping to add to the land value of cow-calf operations. Glad to see this here. Would also be interested in seeing a pilot study that looks at carbon sequestration with GMP and how we can add value to the land.</p>	<p>Considerations of a pilot project further exploring carbon sequestration and GMPs is of interest to the USRSB as well. Additionally, we have included some clarifying language in the introductory section around pilot support.</p>
111	<p>Cattle should have adequate supplies of fresh feed and clean water, not just feed and water. Also, is it proper to suggest that cow-calf producers meet the recommendations of the NRC or follow the recommendations of a nutritional consultant? This statement may be more appropriate for the feeding sector.</p>	<p>Clean water is a regulatory issue for human consumption with many requirements, but is not defined in a related manure for livestock. We are hesitant to include the word which could be confused with the statutory requirements for human drinking water. The vast majority of feedyards due utilize or have full-time nutritionist because animal feed efficiency is a key factor in their business. Forage-based operations, however, may use a similar consultant. USRSB has provided resources around this subject.</p>
112	<p>Collaboration is good especially sharing information and seeking opportunities to better serve our customers. It is important also to ensure that all standards are voluntary and that individual participation and/or performance is not recorded unless the individual(s) wish to share their information.</p>	<p>Thank you for your comment. The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p>
113	<p>Collaboration is good especially sharing information and seeking opportunities to better serve our customers. It is important also to ensure that all standards are voluntary and that individual participation and/or performance is not recorded unless the i</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p>
114	<p>Conclusion: If the beef industry is truly committed to supporting a scaled-up system for sustainability, we strongly encourage USRSB to address the concerns and recommendations that we have shared above. The goal should be to develop a well-designed solution system supported by effective federal and state policies and protections that (1) incentivize, enable and sometimes mandate good and improving management; (2) offer producers extensive technical assistance and increasing benefits for better results, and thus (3) generate a "race to the top" in which major retailers and brands both use the USRSB framework to raise the floor of their beef supply chains, and purchase an increasing percentage of their beef at fair prices from independent third-party certified sustainable suppliers.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Regulatory affairs, legislative lobbying and engagement in business-to-business ventures is out of scope for the USRSB.</p>
115	<p>Correct spelling - Wagyu</p>	<p>Changed as suggested.</p>
116	<p>Could also include competition for grasses with wildlife.</p>	<p>We are not clear what your specific suggestion was. Please provide us with clarification during the second comment period so we can consider the suggestion.</p>
117	<p>Could also restate what you had in the intro section, the characteristics of soil and grasses differ on each ranch so each grazing plan will be site specific.</p>	<p>The USRSB intends the Framework to be a place for producers to find the resources they need to begin or evaluate their GMP, with the full understanding that all GMPs will be a set of site or operation-specific considerations. USRSB has clarified this intent and expanded the resource section based on your comment.</p>
118	<p>Cow + Calf: A stronger statement on non-medicinal antibiotic use seems necessary to move toward sustainable systems.</p>	<p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p>
119	<p>Cow-Calf - Some metrics do not allow producers to measure how well they are meeting the objective of the indicator areas. - The metrics do not provide specific areas for improvement. - We need a better explanation of the value proposition for producers to adopt best management practices.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p> <p>USRSB will continue to provide resources for all sectors to evaluate themselves against the metrics.</p>

120	<p>Dear Stakeholders of the US Roundtable for Sustainable Beef, We appreciate the opportunity to review and comment on the US Roundtable for Sustainable Beef (USRSB) Sustainability Framework. As one of the leading environmental organizations in the United States with a watchdog role for sustainable food production, X has a vested interest in the framework and its implications. The environmental footprint of the average American's annual beef consumption is a leading cause of environmental degradation, climate change and threats to endangered species. The Food and Agriculture Organization of the United Nations, the U.S. Environmental Protection Agency, the Intergovernmental Panel on Climate Change, and numerous independent researchers have all found beef production to be a significant source of greenhouse gas emissions, water pollution, freshwater use, habitat degradation and biodiversity loss. Meanwhile, grazing cattle destroy native vegetation, damage soils and stream banks, and contaminate waterways with fecal waste. Compared to other forms of animal agriculture, beef production has been widely shown to have the greatest negative impact on the environment, climate and biodiversity. In light of the well-documented effects of beef production on the environment, the USRSB has the opportunity to create a meaningful framework that holds producers accountable for their environmental footprints and creates higher standards for workers and animal welfare. Sustainability must apply not only to the environment, but to the well-being of people and animals. We were disappointed to find that the USRSB's sustainability framework fails to achieve any of these goals. As a result, we question the commitment of USRSB industry leaders to advancing truly sustainable practices. The same corporate players in the beef and restaurant industries (and trade group representatives) have worked aggressively for years to prevent, delay or weaken legal protections for America's environment, climate, public health, animal welfare, workers and producers. The framework shows no indication of an intention to change those practices or hold producers accountable to any meaningful standards. Instead, its lack of accountability and failure to address the environmental harms caused by beef production, including grazing, will amount to nothing more than greenwashing. Worse, it will negatively affect independent producers committed to higher sustainability standards, erode the credibility of the beef sector and increase threats to the environment.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability, which is outlined in our mission statement, vision, goals and objectives. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. The USRSB is meant to support and be adapted to all types of beef production systems in the U.S.</p>
121	<p>deforestation is not a risk in the U.S, this seems less meaningful than a metric based on conversation meaningful in the US.</p>	<p>The Retail/Food Service Sector includes U.S. based companies that have domestic and international beef supply chains. Recognizing that retail and food service providers seldom have direct influence on significant land resource impacts through their operations, the Retail/Food Service Sector's Land Resources metrics and sustainability assessment guide focuses on a company's ability to influence in its supply chain. Deforestation has been identified as a risk associated with land use change due to beef production in many international markets. Since many US retailers and food service providers have international supply chains, it is important that the retail metric address this detrimental issue. Furthermore, this is an issue shareholders are asking publicly traded companies to address in their beef supply chains. If we are going to change the metric based on grassland conversion, we need to have concrete suggestions for ways retailers can encourage conservation practices in the US. The Retail/Food Service Sector is open to suggestions for grassland conversion metrics and guidance that will provide concrete and measurable solutions. However, in the absence of such guidance retailers/food service companies will continue to explore ways to support conservation practices in their individual supply chains. At this time, we are proposing adding a Level III Metric that supports grazing management plans to maintain and reduce grassland conversion.</p>
122	<p>Each sector should have only 1 metric to be consistent with the rest of the framework.</p>	<p>The Packer/Processor sector opted to include a graduated set of metrics based upon degree of complexity and detail adopted by participating organizations. This approach to recognizing metric performance status within an indicator by using "Level 1, Level 2, Level 3" categories is useful for benchmarking the status of enterprises with pre-established measuring and reporting practices. From a sector level this creates a mechanism to improve performance for an enterprise across each indicator.</p>
123	<p>efficiency and yield - There needs to be an aspect of the literature reviewed and discussed that speaks to a balanced approach to efficiency and yield across components reviewed. This can be affected by environment, production or business focus. Also, there can be longevity issues presenting themselves if too much weight is given to any one component...such as animal welfare, resource impact, etc.</p>	<p>We have included additional language as an introductory section to further explain the indicator selection and provide clarification around a balanced approach to efficiency and yield to ensure a positive association with all of the high priority indicators.</p>
124	<p>Employee Safety & Well-Being Indicator: 5. It would be good to see more metrics on employee wellbeing and safety. For example, migrant workers from Mexico and Peru are entering the US under the H-2A Temporary Agricultural Worker Program and are being employed on large cattle farms/ranches in the U.S. Metrics to track whether the farming/ranching organizations have management systems in place to ensure that issues that migrant workers are at high risk for (e.g., forced labor, working hour and wage violations, human trafficking, etc.) have no place in sustainable beef production.</p>	<p>While we understand and appreciate the intent of this comment, the USRSB is focused on setting expectations within a metric for all employees that promotes a safe workplace. The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p>
125	<p>Even if we adjust the metrics, these success criteria could stay the same.</p>	<p>The Packer/Processor sector opted to include a graduated set of metrics based upon degree of complexity and detail adopted by participating organizations. This approach to recognizing metric performance status within an indicator by using "Level 1, Level 2, Level 3" categories is useful for benchmarking the status of enterprises with pre-established measuring and reporting practices. From a sector level this creates a mechanism to improve performance for an enterprise across each indicator.</p>
126	<p>Explain why the USRB but will not mandate standards nor verify individual stakeholder performance. It is stated later, that each sector of the supply chain will self evaluate, good to state here as well and why this decision was made. It does lead me to question what is the incentive to meet the indicators.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Mandating of standards and/or verifying individual stakeholder performance is out of scope of USRSB.</p>
127	<p>Farmers and Ranchers have been managing their livestock and forging productive cattle operations for a very long time. We do NOT need more regulations telling producers what to do. They are better stewards of their land, livestock and way of life than any government organization can ever be. I work in government and strongly oppose ANY push to try and mandate how livestock producers manage their operations and their lives. Farmers and ranchers are some of the oldest and BEST small businesses and by pushing for more regulation under the bogus concept that raising cattle "is not sustainable" is one of the greatest lies of my generation. Unless USRB is going to start feeding our cattle, digging them out during snowstorms and come fix our wells when the pumps go out, you have no business telling producers how to manage their operations. Please get back to supporting producers instead of trying to strangle the profits out of their old, weathered hands.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Currently, more than fifty percent (50%) of the USRSB membership are producer or producer associations. To date, cattle producers have been very supportive of the effort and are looking at the USRSB Framework as a resource for producers who are looking for continuing opportunities on how to improve their operations overall. It is and will remain a voluntary effort to help improve the sustainability of U.S. beef production.</p>
128	<p>Feedyard - A few of the questions seemed repetitive. For example, if a feedyard has a NPDES they will meet all the requirements that are asked about in subsequent questions. - We believe that metrics should not be stricter than the current state regulations relative to nutrient planning.</p>	<p>We agree with your recommendation to simplify the supporting question response structure. This section has been revised to allow a feedyard to answer one question regarding whether or not an NPDES permit is in place. If so, it is not necessary to continue through the remaining questions in this section.</p>
129	<p>Feedyard: Table 1. This table needs more explanation to be helpful. The full reference for the LCA is needed, and a brief explanation for how the numbers were calculated is also essential. I could not figure out what some of the rows were meant to communicate. The reference list here seems very short considering the vast amount of science that has considered a wide variety of ways to reduce emissions in feedlot beef production.</p>	<p>Based on your comment we have included an introductory section further explaining the LCA.</p>

130	<p>Finally, a truly just and sustainable food system “ one that is fair, healthy, responsible and secure “ must include reduced beef production and consumption. That means that the beef we do produce must be carefully managed and USRSB framework must hold producers accountable to meaningful sustainability standards in order to work towards solutions that benefit the environment, wildlife, animals, workers and producers. Conclusion If the beef industry is truly committed to sustainability, the goal should be to mandate better management and offer producers extensive technical support and incentives to implement measurable improvements. Another goal must be to generate market competition for supply chains and purchasers by encouraging major buyers to purchase beef produced by smaller and mid-scale, independently certified sustainable suppliers. The industry must acknowledge the inherent unsustainability of large-scale beef production “ whether grain- or grass-finished “ and work to develop solutions and resources that support producers in their shifts toward more sustainable land and livestock management practices. X will continue to publicly call out greenwashing if the USRSB moves forward with this framework without (1) making significant changes that include an accountability mechanism, (2) promoting sustainable practices that credibly reduce the many impacts of beef production on the environment and (3) addressing the industry’s track record of impeding regulatory enforcement of environmental protections. Americans are increasingly seeking food that’s better for the planet, animals and their own health, and they are looking for leaders they can trust to produce food sustainably. The USRSB must show that it understands the challenge of improving sustainability in beef production by acknowledging the enormous environmental impact of the sector as a whole. In its current form, the USRSB’s framework threatens to erode any trust Americans may have in beef producers who are attempting to reduce their environmental footprint. To demonstrate its seriousness regarding sustainability, the USRSB must redesign the framework to include meaningful standards and incentives that credibly reduce the many</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Mandating of standards and/or verifying individual stakeholder performance along with engagement of business-to-business ventures is out of scope of the USRSB. The Framework is intended to be adaptive to all types of beef production systems in the U.S.</p>
131	<p>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.</p>	<p>Each supply-chain sector was responsible for determining the best approach to metrics for their sector. That determination led to different approaches taken by different sectors. Each sector has a provided a rationale for their determination.</p>
132	<p>Finally, X applauds the USRSB for developing the metrics by sector, and can appreciate the uniqueness of each sector as having developed a suite of metrics that will work best and has the most chance of success in their sector. From the producer sector, we believe USRSB has found the appropriate balance of improving sustainability outcomes and producer engagement. We look forward to working with you in the future.</p>	<p>We too expect that this approach will help encourage uptake of this work by all sectors in the value chain.</p>
133	<p>Finally, X previously urged you to include Food Safety as an indicator of sustainability, and this measure was also ranked highly by USRSB members during the indicator development process, receiving the top score among indicators within the Community dimension of sustainability. Yet the USRSB chose not to include Food Safety as an indicator selecting instead the lower-ranked Worker Safety and Wellbeing indicator to serve as the sole Community dimension of sustainability. We urge you to re-consider this approach, include Food Safety as a top-line indicator, and expressly discuss preventing antibiotic resistance as an important aspect of food safety.</p>	<p>During the indicator development process, the USRSB agreed to identify a group of six high priority indicators. When reducing the number from 13 to 6 (first round of indicator development reduced the number from 160 to 13), the group agreed unanimously that the indicators Consumer Perception, Transparency and Profitability should be considered crosscutting requirements across multiple indicators and would not be identified as one of the specific high priority indicators. In other words, the USRSB believes that profitability is foundational to all indicators. Additionally, the USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business. For food safety, similarly the group agreed that food safety was foundational for the viability of the beef supply chain, touching every facet of beef production, processing, distribution and consumption.</p>
134	<p>First, X reminds the USRSB that, if an operation cannot be profitable it cannot accomplish any of the metrics listed, whether they be high priority metrics or otherwise. It is a threshold question that must be answered by every operation before conservation practices can be implemented or employee salaries can be paid. Our suggestion to USRSB would be to make the “Efficiency & Yield” indicator more clear by calling it “Profitability”. The metric under the current “Efficiency & Yield” indicator for both the cow-calf and feedyard sectors are appropriate for the “Profitability” indicator and appropriate considerations for any operation to continue as a functional enterprise.</p>	<p>During the indicator development process, the USRSB agreed to identify a group of six high priority indicators. When reducing the number from 13 to 6 (first round of indicator development reduced the number from 160 to 13), the group agreed unanimously that the indicators Consumer Perception, Transparency and Profitability should be considered crosscutting requirements across multiple indicators and would not be identified as one of the specific high priority indicators. In other words, the USRSB believes that profitability is foundational to all indicators. Additionally, the USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business. For food safety, similarly the group agreed that food safety was foundational for the viability of the beef supply chain, touching every facet of beef production, processing, distribution and consumption.</p>
135	<p>Five Reasons Why the USRSB Framework is Deeply Flawed 1. Failure to establish fair pricing mechanisms and address the consolidated structure of the U.S. beef marketplace. A central flaw in the USRSB Sustainability Framework is its failure to address the consolidated structure of the U.S. beef marketplace, which depresses producer prices for conventional meat and keeps sustainable beef from being produced and reaching consumers. As the framework states on page one, “economic viability” is the key to producing sustainable beef. However, the highly concentrated U.S. beef market—in which four of the largest beef producers control 85 percent of production—is simply not viable for many cattle producers in America. With this monopolized corporate control of prices offered to producers, the beef market is fundamentally unequal, and unfair. If the framework fails to address these structural barriers, or to enact fair pricing mechanisms, the USRSB Sustainability Framework will be nothing more than a façade that instead drives credibly sustainable producers from the market, making beef production even more unsustainable.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Engagement of the USRSB in business-to-business ventures is out of scope for the USRSB.</p>
136	<p>For decades, cattle feeders have worked diligently to improve the efficiency of our operations and remain economically viable. We have and will continue focus on the other key areas identified by USRSB, which include animal health, nutrition and animal care and handling, environmental management for our water, air and land, and providing a safe workplace and supporting our rural communities. In our view, USRSB has developed the correct list of priorities for the beef supply chain.</p>	<p>We appreciate your support.</p>
137	<p>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.”</p>	<p>We like your suggestion to re-label the first paragraph ‘Overview of the Retail and Food Service Sector.’ We still want to have the Diverse Business Model be it’s own section because we want to reinforce the diversity of business models within our sector, but feel we should move up this paragraph to go below the overview paragraph and explanation paragraphs.</p>
138	<p>For example, the water resources indicator is, “The volume of water used by a sector for each process, and any impacts on water quality by a sector for each process;” and the metric for measuring the indicator is: “A grazing plan (or equivalent) being implemented that maintains or improves water resources.” This indicator fails to concretely measure progress on improving water use efficiency (e.g., gallons of water applied per lb. of beef produced) or water quality (e.g., miles of U.S. waterways impaired by livestock grazing and/or animal feeding operations). Thus, it will not meaningfully illustrate movement toward sustainability. Most USRSB metrics suffer from this same problem.</p>	<p>USRSB recognizes a step-wise approach to progress. We also firmly believe that a GMP will lead to the outcomes you recommend. The USRSB specifically designed our framework to improve rangeland management practices and rangeland condition on multiple environmental metrics including wildlife habitat (including rare and sensitive species), water quality and quantity, GHG emissions, agriculture conversion, and others. By increasing the number of operations with comprehensive, well designed GMPs, the USRSB is confident that the ultimate outcome will be improved metrics around wildlife, water quality and quantity, GHG emissions as well as other important metrics for working lands. But the GMP is the first step and cannot be overlooked as the starting point toward improving the outcomes you mention.</p>

139	General comment for packer/processor SAG: Several facts that need citations. General comment for packer/processor SAG: Wording of metrics is inconsistent regarding which metrics are facility level and which are company level. General comment for packer/processor SAG: Metrics that are quantitative but do not ask for trend data, do not offer insight into a company's performance. For example, is water use trending up or down and why? General comment for packer/processor SAG: Metrics that require a yes or no answer but do not ask for an explanation, limits a packer/processor's opportunity to share their story. For example, yes we have a CI goal for water, but we are not asked to share what that goal is. Or yes we track employee injury rates but we are not asked to share what those rates are.	Edits have been made based on your suggestions. -Citations have been provided to facts needing them. -Use of the word facility or company are meant to be interchangeable, however where possible we revised wording to be specific. - Regarding quantitative data and trends; language clarification has been made to indicate that a company should set a benchmark and watch the direction of the trend to understand if they are in line with the trend. - It is important for this sector to share its story. Even outside of this Framework, USRSB encourages companies to publicly discuss the innovative and creative activities that each facility or the whole company has engaged in which will improve the sustainability of the beef industry. Language has been added to encourage the sector to share their stories.
140	General comments: X appreciates the opportunity to provide comments regarding the draft Sustainability Framework developed by the U.S. Roundtable for Sustainable Beef. Overall, X concludes that the sustainability framework is appropriately structured to advance continuous improvement in beef supply chain sectors. It provides solid general guidance for producers in the cow-calf sector, as well as other grazing phases of beef productions. X finds that there are challenges in the format and usability of the framework as currently constructed. We recommend that the USRSB consider changes to make the framework more useable and consider providing examples to illustrate some concepts	Based on your comment, we have added an introduction section that provides clarification around the process we have followed and will follow in the future. Additionally, the Framework has been revised to improve organization and formatting consistency across all SAGs without losing by sector relevance.
141	Generally, the document covers the metrics established. However, it lacks opportunities for packers to state what they are doing to improve sustainability.	The metrics were written as a starting point to address key sustainability indicators with the intent to keep them broad enough for the diversity of business models within the Packer/Processor Sector and to encourage adoption. Beyond the yes/no answer, we believe it is a business decision to identify how a company wants to proceed with the metrics and further develop their own sustainability targets. We do believe the metrics will develop over time and may include additional responses similar to what your comment has indicated.
142	Good to say that cow-calf slow adjustments to market demands are important challenge to overcome but will not be addressed at this stage in the framework (because the framework sets the goals and to be met) but could be a future next step. For instance, there may be a market demands for grass fed beef but there are a lot of changes that have to happen on both the supply and demand side to make this change happen. From the demand end: grass fed sustainable beef tastes different so how will the demand side adjust to this? Also, requires cattle staying on the range longer, and longer aging process, as well as packing plants closer to cow-calf operations etc. So on demand end - need to be willing to pay a higher price. On the supply end this would mean less supply.	Regarding different types of beef production systems (i.e., grain vs. grass finishing) the mission and vision of the USRSB focuses on the environmentally sound, socially responsible and economically viable production of beef in the U.S., regardless of the type of production system. Each type of beef production should be evaluated under the auspices of the six high priority indicators. The USRSB guidance is intended to support and improve all forms of beef production. We have included language in the introduction section of this document to ensure that point is clear.
143	Good.	We appreciate your support.
144	Grazing can also reduce fuel loads which if burned directly emit GHGs to the atmosphere.	We have added to desired outcomes list of land resources indicator: Reduced fuel load which can reduce the risk of high-intensity wildfires.
145	Guidance to achieving metrics: The scope and formatting of these sections differ substantially. Each sector should strive to (1) include sufficient details to give context for each item listed as guidance and (2) suggest specific example metrics that can be used to track improvements (essential for attaining benchmarks that can be used to track progress)	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition of an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Each sector was developed by its own sector participants. The Framework has been revised for improved consistency in formatting and organization.
146	How does a GMP make each of these improvements should be stated here.	USRSB recognizes that the mere existence of a GMP does not necessarily lead to these improvements; but the increase in awareness of potential for improvement the GMP offers is the first step. Implementation of the plan is also a critical component. USRSB will include examples of how these improvements would occur.
147	I am not aware of such a diverse suite of stakeholders coming together to work towards more sustainable beef industry, not an easy task. It might be useful to have section on background : What this framework is and what it isn't. A next steps section would be a good addition. For instance I haven't seen it referenced that you intend to have some pilot areas to address each of the indicators. I think it would add strength to this document to share that this is not document is not the endpoint of this effort but the framing of this effort.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition of an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
148	I am not familiar with phrase "green side up." I suggest if we use it here, it should be explained or a less trendy phrase used.	Agree that this is not the appropriate term and will change it to "intact grassland."
149	I am not sure that the method for meeting the indicators is outlined in this framework. I would say in each sector of the supply chain, the USRSB identifies, the why, the what, but not the how. Because the how is left to each sector. I would love to see methods developed, I worry that this won't become more than a suggestion without a method for evaluating the metrics.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition of an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
150	I assume the intended audience include stakeholders across the supply chain who have not been a part of developing this framework might not understand the lifecycle assessment model. A link to what it is could be helpful, especially since it is specifically called out here as an example.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition of an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed, will follow in the future and additional explanation around the lifecycle assessment model including links for additional reading.
151	I believe there needs to be more discussion regarding the strategies to mitigate Air & Greenhouse Gas Emissions that could include the use of anaerobic digestion of manure in CAFOs. Tremendous air quality benefits can be derived from the integration of this technology with a confined beef cattle feedlot. Anaerobic digestion for CAFOs can also help improve water quality, soil health, water recycling, carbon sequestration, and conservation efforts which will allow the beef cattle industry to become more sustainable.	This technology has been evaluated and researched over the years as an option for confined beef cattle feedlots. Since manure at a feedlot is managed as solid manure and not wet manure, to implement anaerobic digestion would require the addition of significant volumes of water and the construction of anaerobic treatment lagoons. To subsequently utilize the by-products of anaerobic digestion, the liquid manure would have to land applied in close proximity to the feedlot or fossil fuels would need to be used to dry the manure back down in order to load the manure and haul it to fields on spreader trucks for land
152	I believe there needs to be more discussion regarding with the strategies to mitigate Air & Greenhouse Gas Emissions that could include the use of anaerobic digestion of manure in CAFO's. Tremendous air quality benefits can be derived from the integration of this technology with a confined beef cattle feedlot.	This technology has been evaluated and researched over the years as an option for confined beef cattle feedlots. Since manure at a feedlot is managed as solid manure and not wet manure, to implement anaerobic digestion would require the addition of significant volumes of water and the construction of anaerobic treatment lagoons. To subsequently utilize the by-products of anaerobic digestion, the liquid manure would have to land applied in close proximity to the feedlot or fossil fuels would need to be used to dry the manure back down in order to load the manure and haul it to fields on spreader trucks for land
153	I find myself asking for what is next. So would be good to suggest up front more clearly that the framework is the foundation of developing a stronger sustainable beef program. The framework purpose is to...do x, y. (For instance: The purpose of this framework is to establish agreed upon indicators for each end of the supply chain to meet to reach sustainability levels for , and identify what each metric to measure the indicators are each sector of the supply chain will	Based on your comment, we have made some clarifications through the addition of an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.

154	I have reviewed the USRSB framework in detail and had the opportunity to listen to an in depth introduction and background on the history and development phase by Mrs. Stackhouse- Lawson. I am quite frankly very impressed by the document at this stage. In particular, knowing some of the struggles it took to produce the current version and the reasons why it is so important to have a working framework for continuous improvement in the future. There are many ways to complicate this procedure, but I see few ways to make it more simple while still remaining comprehensive across all sectors of the industry. Implementation and review will provide the means of improving and streamlining the process further, but I believe we have a great starting point and want to commend the hard work of the USRSB Directors.	Thank you for your support.
155	I think it is critically important that the framework follows the same approach for continuous improvement, Having this consistency makes the framework stronger and more credible. I appreciate the simplistic approach that the producer sectors have taken with 1 metric per indicator. In the future, this can always be made more complicated if necessary.	The Packer/Processor sector opted to include a graduated set of metrics based upon degree of complexity and detail adopted by participating organizations. This approach to recognizing metric performance status within an indicator by using "Level 1, Level 2, Level 3" categories is useful for benchmarking the status of enterprises with pre-established measuring and reporting practices. From a sector level this creates a mechanism to improve performance for an enterprise across each indicator.
156	I think only one metric should be selected. The other metrics can be incorporated into key elements.	The Packer/Processor sector opted to include a graduated set of metrics based upon degree of complexity and detail adopted by participating organizations. This approach to recognizing metric performance status within an indicator by using "Level 1, Level 2, Level 3" categories is useful for benchmarking the status of enterprises with pre-established measuring and reporting practices. From a sector level this creates a mechanism to improve performance for an enterprise across each indicator.
157	I think we need to add to each of these outcomes. 1. Improve management of wastewater 2. Improve and monitor soil health - or something similar.	We have incorporated this suggestion.
158	I would be very interested in the pilot projects in this sector. Especially an incentive component (like sustainable or certified product). There would be a lot of value if the whole supply chain, via the USRSB developed this. There has been a lot of focus on the supply end, but I wonder if one main reasons that a sustainable beef or conservation beef market hasn't gotten to the scale needed is needing more attention on the demand end, specifically education the markets what it takes to have a sustainable product.	A discussion was added to the Framework introductory section.
159	I would consider CO2e an abbreviation, and therefore should be spelled out the first time it is used in the document and the abbreviation put in parenthesis, and thereafter referred to as the abbreviation.	We will make this correction to the final document.
160	I would suggest adding a next steps section for each sector of the supply chain . I know that USRSB has discussed future pilot areas to use these SAGs to look at developing a stronger sustainable beef program. It would be good to share this.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
161	I would suggest only one metric to ensure consistency across the framework.	Our sector established a tiered approach to the metrics that allows for continuous improvement. We have written the metrics to allow operators of all sizes to participate to the degree of their business interests. The USRSB is a voluntary commitment and each business has the right and responsibility to decide what level of continuous improvement they want to achieve for their business objectives.
162	Identify only one metric to ensuring consistency across the framework.	Our sector established a tiered approach to the metrics that allows for continuous improvement. We have written the metrics to allow operators of all sizes to participate to the degree of their business interests. The USRSB is a voluntary commitment and each business has the right and responsibility to decide what level of continuous improvement they want to achieve for their business objectives.
163	I'm glad to see attention being paid to animal welfare within this sustainability framework. However, please note that animal productivity is not a sound proxy for animal welfare, especially at the herd level. In fact, many steps we've taken to increase animal productivity have had negative consequences for animal welfare. For more info, please see Rauw 1998 (Undesirable side effects of selection for high production efficiency in farm animals: a review) and Lawrence et al 2004 (Breeding and animal welfare: practical and theoretical advantages of multi-trait selection).	During the process of identifying the 6 high priority indicators that the USRSB members engaged in the fall of 2014 and spring of 2015, it was clear to the value chain that animal welfare (Animal Health & Well-being) must be included as one of those top priorities. As part of the metric development process with the roundtable, the cow-calf, auction market and feedyard sectors identified the Beef Quality Assurance Program and the Cattle Care and Handling Guidelines as the focal point for cattlemen and women to address the Animal Health & Well-being indicator.
164	Implement COOL to protect the U.S. label and the U.S. beef Not some foreign meet that has been ship to the U.S. and is labeled U.S. Who ever started that (we all know who did) shame shame We all know that it was done to put the all mighty dollar in someone's pocket and it was not the cattleman of a U.S. producer....	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Additionally, regulatory affairs and legislative lobbying is out of scope of the USRSB.
165	In addition to calling out the need for succession/transition planning, are there other opportunities to address social barriers that affect this sector (e.g., are there opportunities for producers to provide internships, training, or other opportunities that can help ensure there is a next generation of interested farmers/ranchers?)	Social barriers are important issues. The cow-calf sector believes a GMP and succession plan is the most appropriate place to start and has the greatest opportunity for improving the Land Resources metric in the cow-calf sector.
166	In addition, transition planning helps to keep the land in agrarian use, minimizing the sale of land for development.	The USRSB agrees. This was one of the considerations by the cow-calf sector when choosing this metric for Land Resources.
167	In addition, we question the commitment of key USRSB industry leaders to advancing the core tenets of sustainability. This is because even while participating in the USRSB, leading corporate actors in the beef and restaurant industries (and their trade group representatives) have worked behind the scenes for years to prevent, delay or weaken federal and state policy protections for America's environment, climate, public health, animal welfare, workers and producers.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
168	In addition, well-managed operations that provide more ecosystem services to society should receive a premium price for their product. Only in those circumstances will any "framework" be able to promote a true movement to "sustainability." An industry dominated by just a few actors is a serious impediment to this urgently needed progress. In fact, if buyers can get away with only paying rock bottom prices, the only way producers can survive is to maximize the amount of beef they sell, not the sustainability of it.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Regulatory affairs and legislative lobbying is out of scope of the USRSB.
169	In places where irrigation in place could have a metric that is efficient irrigation system. There is some interest in Montana to study seeing if a combination of irrigation systems are more efficient and increase ground water storage and temperatures of in stream flow. Flood irrigation in the spring and early summer and switching to sprinkler/pivot in the late summer and fall. Could be an interesting pilot study as well for the USRSB.	The USRSB is interested in supporting and sharing results of projects designed to deliver continuous improvement in all sectors and encourages stakeholders to make the USRSB aware of such projects.
170	In the interest of making beef production credibly more sustainable, we urge you to go back to the drawing board and commit to a major overhaul of the framework and metrics that will credibly address these impacts. In addition, we recommend that the USRSB develop a transparent joint plan of action for establishing policies, and regulatory and structural reforms that foster true sustainability in the U.S. beef sector.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Regulatory affairs and legislative lobbying is out of scope for the

171	Increased used of animal health products may not necessarily be a negative. For example, increased use of vaccines under the proper conditions may decrease the overall use of antibiotics. This should be reworded to not discourage ranchers from using preventative animal health products.	A distinction has been made between animal health products and antibiotics.
172	Increasing efficiency has been a sustainability target for many years within animal production. While increased efficiency indeed can lead to lower resource use, current research indicates that efficiency is important, but insufficient, to meet sustainability goals. In addition, increased efficiency incentivizes increased production, and still lead to overall greater negative environmental impacts.	We have included additional language as an introductory section to further explain the indicator selection and provide clarification around a balanced approach to efficiency and yield to ensure a positive association with all of the high priority indicators.
173	Interesting that it is not mentioned that these outcomes can increase profitability as well. This could be said throughout the framework.	The USRSB agrees that profitability is a foundational issue for beef sustainability. We agree that the discussion around profitability should be made throughout the document. We will provide an expanded discussion around profitability as a foundational pillar in beef sustainability for all sectors.
174	Is the grazing management plan going to be reviewed by anyone, even if it isn't the USRSB who might, in Montana, it could NRCS (Natural Resources Conservation Services) or TNC, etc. I would suggest that a metric is more than having one but a good one. What constitutes a good GMP should be stated or determined by this group as a recommendation. Could be as simple as using one that has been created by NRCS, TNC or equivalent, similar to USRSB suggestion to use BQA. OR what constitutes a good GMP could be more specifically outlined by the USRSB.	The Framework does generally address what a well planned GMP contains. Resources have been added that will assist producers in analyzing the needs of their operation.
175	is this for the first gtaph?	We are not clear what graph you are referring to. There is no graph currently included in the Cow-Calf Air and Greenhouse Gas Emission section. Please comment again during the second comment period with further clarification on which graph you are referencing.
176	It also allows the land manager to measure success by documenting current conditions at start of grazing plan and along the way . Through these comparisons the manager can evaluate and adjust to what is working and what is not working.	We appreciate your support.
177	It appears the resources and tools section has been left out of this document. This section will be key to helping producers adopt these metrics and need to be included going forward.	Based on your comment, we have increased the quality of the resources provided. As the Framework will continue to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.
178	It is disconcerting that the air & greenhouse gas emissions section is completely missing a discussion about GHG from the cattle themselves (including enteric fermentation and manure). This is striking as grazing land management and pasture quality affect those emissions both positively and negatively.	The following addition has been made to the document: "Enteric and manure emissions are also a considerable source of GHGs for the beef value-chain. This is also an evolving area of research. In general, improving animal efficiency and yield is the greatest way to reduce GHG emissions, particularly from the Cow-Calf Sector that is primarily extensive and forage-based (Asem-Hiablie et al., 2018). In extensive grazing systems, manure management by people is difficult or logistically impossible, beyond grazing management. However, in extensive grazing systems, the management of manure is resolved by insects and microbes that consume and break down the manure, returning it back to the soil as fertilizer. Therefore, manure emission is a positive element of grazing as it is a relevant part of the plant-animal-soil cycle." Asem-Hiablie, S., T. Battagliese, K. R. Stackhouse-Lawson, and C. A. Rotz. 2018. A life cycle assessment of the environmental impacts of a beef system in the USA. Int. J. Life Cycle Assess. https://doi.org/10.1007/s11367-018-1464-6 .
179	It is important that USRSB recognize that GMP's are unique to the operation and not get to prescriptive about how a GMP should look. Key elements should be included, and there are good plans and ones that could be improved, but the key is that a plan exist that can help that operation make improvement.	The USRSB intends the Framework to be a place for producers to find the resources they need to begin or evaluate their GMP, with the full understanding that all GMPs will be a set of site or operation-specific considerations. USRSB has clarified this intent and expanded the resource section based on your comment.
180	It is important to remember that a larger Enterprise is .more vulnerable to outside influences including weather, disease, terrorist attack, feed and water availability, transportation requirements. Assessing all segments of the beef industry should include a strategic plan for managing risk should this occur. Each segment would ha Require different action plans.	Included in the Framework is a brief discussion of risk management. We agree generally that there should be an expanded discussion of the benefits of risk management, which should include preparedness for natural and manmade disasters.
181	It is important to remember that a larger Enterprise is .more vulnerable to outside influences including weather, disease, terrorist attack, feed and water availability, transportation requirements. Assessing all segments of the beef industry should include a strategic plan for managing risk should this occur. Each segment would ha Require different action plans. Employee may not produce more efficiencies. Reliability is key to supporting your statement.	Included in the Framework is a brief discussion of risk management. We agree generally that there should be an expanded discussion of the benefits of risk management, which should include preparedness for natural and manmade disasters.
182	It is interesting that this is a self measured including how it will be measured. I would suggest the future pilot study areas could develop protocols and templates for the evaluation. This would accomplish two things: one cow-calf operations are part of the process (buy-in for the evaluation) and also that an evaluation process actually happens (my experience is that more likely to happen if there is a process in place).	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
183	It seems like yields and plant efficiency should be addressed here - not waste. I think the feeder sector did a good job with this.	In regard to Efficiency & Yield metrics for the packer/processor sector there are some legal limitations in our discussions. The USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business. Due to these concerns the packer/processor sector decided to focus on waste.
184	It should be noted that a VCPR is not just encouraged, but in states like California required in order to purchase and administer antibiotics.	We agree that maintaining a Veterinarian-Client-Patient Relationship (VCPR) is a top priority to help ensure the proper and judicious use of antibiotics. We also appreciate your comment and will add some clarification around this guideline.
185	It should be reinforced that no industry makes "changes" voluntarily without some form of driving market pressure. Further, no industry (or segment thereof) is more expected to make non-economically incentivized change than cow-calf producers. That said, "producer independence" is not the primary source of this sector's slowness to change. Rather, it is more often the financial realities of animal agriculture. Businesses that must operate in a cash-poor, capital-intensive environment do not have the luxury of rapid change to satisfy consumer demand. It takes time to develop the necessary liquidity to implement major production changes. No cow-calf producer who is serious about operating a profitable business will allow their "independence" to prevent or delay change - even if the economic return won't be realized in the short term. Any implication to the contrary would impugn the business savvy of cow-calf business owners.	During the indicator development process, the USRSB agreed to identify a group of six high priority indicators. When reducing the number from 13 to 6 (first round of indicator development reduced the number from 160 to 13), the group agreed unanimously that the indicators Consumer Perception, Transparency and Profitability should be considered crosscutting requirements across multiple indicators and would not be identified as one of the specific high priority indicators. In other words, the USRSB believes that profitability is foundational to all indicators. Additionally, the USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business.
186	It would be helpful if there was a link added to click on to see Figure 3.	Organization was improved so figure 3 was easily referenced.

187	It would be helpful to add specific details on Field to Markets indicators, metrics and benchmarks in this document. Feed sourcing is a huge portion of the footprint of the feedlot sector, so this derivative approach of simply referencing Field to Market is unsatisfying.	The USRSB and Field to Market have entered into a collaboration agreement to explore how the two sustainability initiatives can jointly work together to address feed sustainability. This collaboration is still in its infancy. We recognize the importance of addressing feed sustainability and look forward to making progress in this space through our collaboration with Field-to-Market.
188	Key failures of the proposed framework include: 1. Absence of monitoring, certification, and accountability for producers. The framework does not provide any mechanism to certify individual producers or otherwise hold producers accountable for environmentally destructive management practices. Without a plan for independent certification, monitoring and evaluation of results, or repercussions for failing to meet or uphold basic standards, the framework cannot be effective. The beef marketplace's standards of sustainable production will be significantly weakened by greenwashing efforts if related marketing claims are not defined, certified, monitored, and enforced. We are concerned that beef marketers will use the term sustainable beef much in the way they have used grass-fed beef, which has encouraged consumers to pay elevated prices for poorly regulated and ill-defined products that do not consistently meet credible third-party sustainability standards. The USRSB has stated that it does not plan to "mandate standards nor verify individual stakeholder performance." But without this, the framework cannot be a method of creating trustworthy sustainability standards or measuring progress from individual producers or the sector as a whole. However, if the roundtable made sustainability certification a requirement in order to produce beef (or at least to verify related marketing claims), it would have the potential to reduce environmental impacts of production, build trust between consumers and the industry and reward credibly sustainable producers. As it stands now, the framework will fail to enable beef buyers to differentiate between producers who are making meaningful moves toward sustainability and those who are capitalizing on consumer interest by merely claiming to do so. This undermines the validity of independently certified "sustainable" producers and allows the appearance of progress without actually making any. We encourage the USRSB to develop strong and credible metrics and to endorse or require a certifying process that is independent, verifiable and effective for generating real measurable results.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition of an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Mandating of standards and/or verifying individual stakeholder performance is out of scope for the USRSB.
189	Land Resources – Remove component of conservation easements. While supports easements, this is only one component of financial or land management. Replace with Diversification and appropriate definition description.	USRSB believes economic diversification of operations is important and can include things like eco-tourism, Agri-tourism, hunting, etc. However, the consideration of an easement in this context is a tool in the transition of the ranch.
190	Land resources: The (inelegantly-worded) indicator is, "The stewardship of terrestrial and aquatic habitats in relation to water, soil and biodiversity. Impacts of land use, land use conversion, both caused by and prevented by ranching and farming activities and other supply chain land use decisions." The metric for measuring the health of land resources is virtually the same as for water resources: "Is a grazing management plan (or equivalent) being implemented to protect and/or improve the land resources, including succession/transition planning." a. Overall, this metric fails to measure progress reducing the many impacts of poorly-managed grazing operations. Possible alternatives could include measures such as bare ground (compared to a locally appropriate benchmark), infiltration rates (compared to a locally appropriate benchmark), or other well-established and cost-effective (e.g., National Resources Inventory ¹⁶) metrics. b. This indicator awkwardly wraps in transition planning as a means of reducing the potential for land conversion from ranching to more intensive uses. However, it offers little details regarding how ranchers can assess for the presence of land-related hot spots, ranging from noxious weeds to fish and wildlife conservation, sensitive species, etc. Many of these involve management considerations beyond grazing management itself, so simply measuring for the implementation of a grazing management plan is inadequate for determining whether an operator (let alone the whole industry) is addressing the full suite of land-related hot spots. Some related materials from the water resources guidance (e.g., "Wildlife Resource Inventory and Management") should be moved here. c. However, there is still no guidance on critical management considerations such as how to develop an integrated pest management (IPM) plan for preventing and controlling the costly damage caused by invasive species. Nor is there any guidance on how to reduce conflicts with predators and other wildlife – strategies that can help producers both minimize risks of animal losses and boost livestock productivity (e.g., by moving calving dates from winter to spring, which helps cut both predation losses and supplemental feed costs). d. In addition, there is no guidance for situations on leased lands, where ranchers and farmers often do not have the control they need to implement desired management improvements. This is especially the case on federal public lands, which are plagued by poor grazing management and litigation over related impacts to America's natural heritage of native fish, wildlife and plants. Stakeholders need to devise recommendations for credibly advancing sustainability in these distinct situations, which apply to well over 200 million of acres of grazed ecosystems. e. These are just a few examples of why the materials supporting sustainability of land resources are vastly inadequate for addressing the full suite of impacts caused by poor	a. USRSB recognizes a step-wise approach to progress. It is important to first address science-based comprehensive GMP. We also firmly believe that a GMP will lead to the outcomes you recommend. The USRSB specifically designed our framework to improve rangeland management practices and rangeland condition on multiple environmental metrics including wildlife habitat (including rare and sensitive species), water quality, GHG emissions, agriculture conversion, and others. By increasing the number of operations with comprehensive, well designed GMP, the USRSB is confident that the ultimate outcome will be improved metrics around wildlife, water quality, GHG emissions and as well as other important metrics for working lands. But the GMP is the first step and cannot be overlooked as the starting point toward improving the outcomes you mention. b. USRSB does not understand item b. c. USRSB is building on existing expertise available from government agencies, academia, and other experts to address issues exactly like these. USRSB welcomes any additional resources commenter may have for consideration into the framework. d. Private leased land (relationship between lessor and lessee) is out of scope for the USRSB. However the USRSB recognizes it is a significant issue include a discussion around it. As it relates to Federal, State and other public lands, much of this is regulated by the appropriate state and Federal laws and legislation and regulatory reform are beyond the scope of the USRSB. e. USRSB acknowledges that incentives and direct business to business relationships are important, however this is out of scope of the USRSB.
191	Land resources: The metric is, "Has a nutrient management strategy or plan been implemented". a. As with other practice-based metrics, this approach to measuring the status of land resources will tell us nothing about actual results for reducing nutrient pollution caused by the beef feedyard sector. It is therefore vastly inadequate for determining whether individual operators and the sector at large are making progress in reducing this pollution. b. This metric fails to explicitly address one of the most serious impacts of poor feedlot management: the collection of vast quantities of manure that comes from raising thousands of animals on one facility. Poorly constructed, maintained, and managed manure storage infrastructure, including lagoons, runoff catchment basins, and heaps are a major source of land, air and water pollution, including heat-trapping emissions. Yet the USRSB fails to establish any concrete metrics for responsible manure management – management that credibly reduces the impacts described above.	The USRSB has identified six high priority sustainability indicators which are covered extensively in the sustainability framework and address water, land and air resources, as well as animal health and well-being. For each sector of the value chain, we have identified metrics and resources to help individual operations continuously improve over time. In terms of measuring impact, the Beef Industry Life-cycle Assessment (LCA) can show the industry whether progress is being made. An expanded discussion of the LCA was included in the introductory section.
192	Last sentence(s): Each operation has unique challenges and must adapt management practices based on conditions on the ground. These variances in resource stewardship practices are precisely what has provided consumers the broadest amount of choice in the marketplace. (Something along these lines to reiterate that there is no "one-size-fits-all" approach to sustainability across the supply chain, but most of all in the cow-calf sector)	Suggestion was included.
193	Lastly, X applauds the USRSB for developing the metrics by sector and can appreciate the uniqueness of each sector as having developed a suite of metrics that will work best and has the most chance of success in their sector. From the producer sector, we believe USRSB has found the appropriate balance of improving sustainability outcomes and producer engagement. We look forward to working with you in the future.	We too expect that this approach will help encourage uptake of this work by all sectors in the value chain.
194	Lastly, x applauds the USRSB for developing the metrics by sector, and can appreciate the uniqueness of each sector as having developed a suite of metrics that will work best and has the most chance of success in their sector. From the producer sector, we believe USRSB has found the appropriate balance of improving sustainability outcomes and producer engagement. We look forward to working with you in the future.	We appreciate your support.
195	Lastly, X applauds the USRSB for developing the metrics by sector, and can appreciate the uniqueness of each sector as having developed a suite of metrics that will work best and has the most chance of success in their sector. From the producer sector, we believe USRSB has found the appropriate balance of improving sustainability outcomes and producer engagement. We look forward to working with you in the future.	We too expect that this approach will help encourage uptake of this work by all sectors in the value chain.
196	Level 4 does the retailer market sustainable beef to increase the societal value of the beef supply chain in conserving natural resources?	The purpose of all the Indicators is to help the retail/food service sector market sustainable beef and our Outreach Working Group is working to provide the resources and educational tools necessary to advance beef sustainability which may include how to best market and promote the work the roundtable members.
197	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.	Suggestion was included.

198	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.	The Retail/Food Service membership will review lines 1016-1020 regarding traceability. Traceability does impact the Retail/Food Service Sector, specifically around disease monitoring and food safety initiatives. Per the statement in the SAG on lines 1019-1020, the Retail/Food Service Sector plans to continue discussion on this topic prior to final draft of the guidance. At this time the language in the guidance supports further discussion on traceability efforts up the beef value chain and is not making any commitments or demands.
199	Line 108, wastewater permit non-compliances. This is a misleading metric. I can have no non-compliances at a site with a permit that is not stringent, but still put out dirty water. Or I could have three total suspended solids non-compliances which don't create an issue but look worse as a metric compared to having one ammonia non-compliance that results in a fish kill. If you really want to measure in this area, tracking nutrient load discharged with no beneficial purpose makes more sense.	As you point out, wastewater discharge permits vary and are usually based on the Total Maximum Daily Loading (TMDL) for various criteria pollutants in a particular river basin. To interpret nutrient loading data would require the reader to have TMDL knowledge of each of the river basins in the US where packers and processors are located. This is impractical. Wastewater permit non-compliances is a common metric for packer and processor CSR reporting.
200	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.	Our customers, shareholders and other external stakeholders expect us to work with our suppliers to drive continuous improvement. In order for these metrics to be relevant to Retail/Food Service operators, the metrics must meet the needs of the stakeholders and customers we interact with on behalf of the whole beef value chain.
201	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.	This clarification has been made.
202	Line 119, water quality. Does this mean water (drinking or raw water source) or wastewater? If the former, this number changes slowly and is typically outside of the control of the user, so the metric does not bring value since it can't readily be influenced. If wastewater, see comment above.	Line 119 refers to discharge water quality and this clarification will be made.
203	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.	In regard to Efficiency & Yield metrics for the packer/processor sector there are some legal limitations in our discussions. The USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business. Due to these concerns the packer/processor sector decided to focus on waste.
204	Line 153, Antimicrobial Use: This section does not include an important aspect of antimicrobial use in the food animal industry: a valid Veterinarian-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.	Reference to VCPR has been included in this section.
205	Line 162 – 163: eliminate the second and third sentences in the #2 practice listed in Antimicrobial Use. X feels this language is duplicative of the principals for judicious use of antibiotics found in BQA guidelines and those BQA principals would be better served if simply restated here.	We agree the antimicrobial stewardship is key element of the cattle industry's BQA Programs. We also recognize the importance of a veterinarian-client-patient relationship for the selection and use of antimicrobials. As such, while some of the 14 principles on judicious use of antimicrobials are more directed at producers and others are more directed at veterinarians, we believe that helps to reinforce the need to both the cattle producer and the veterinarian to make antimicrobial stewardship a priority. These 14 guidelines are currently part of the BQA program (all together), in the document entitled "Antibiotic Stewardship for Beef Producers" Manual.
206	Line 162, Level 2, Third Row: For the topic of "Does the company engage suppliers and encourage adoption of USRB water metrics in its beef supply chain?", we would note that for the cow-calf sector, there is no tracking requirement in the metric. Rather, the metric is to address water in the Grazing Management Plan. Line 162, Level 3, Last Row: For the topic of "Does the company track performance on water stewardship in its beef supply chain?" we would note that for the cow-calf sector, there is no guidance to include water consumption tracking in the metric. Rather, the metric is to address water in the Grazing Management Plan, which is an appropriate approach. We suggest that the SAG for Retail and Foodservice clarify that water use tracking in the beef supply chain is only achievable down to the Auction Market level. At the Auction Market and Feedyard levels, the guidance to achieve the metric includes tracking water and establishing documentation for assessing the quantity of water used and conservation. The Packer-Processor sector is more robust yet, given the amount of water required for processing the product safely, and tracking water here is also appropriate. Row 376 to 395: Note that use of these tools are not a part of any other sector. If an entity in the Retail and Foodservice sector chooses to use these tools to track water use metrics in the beef supply chain, that means that people who own Auction Yards, Feedyards, and Packer/Processor facilities would need to report on their water use through one of these platforms. While we understand that this could indeed be an outcome in a business-to-business relationship, we'd like to emphasize that a fundamental tenant of USRSB is that one sector does not mandate business practices to another sector, but that we arrive at these collaboratively. If Retail and Foodservice sector members chose different approaches, for example (such as one using CDP, while another uses a home-grown survey), then producers within the supply chain may be required to keep documentation in multiple formats for different sustainability calculators. We must be cautious that we are not creating additional, undue burden on the members of the supply chain. It would be unfortunate if the outcome were a multitude of tools that are enforced upon the supply chain through the auspices of USRSB. While we do not have a solution at this time, we suggest that the USRSB take this under additional consideration to gain more specificity and limits around what the Retail and Foodservice can require for supply chain reporting. Water is a critical resource, and we recognize the need to address it. However, we want to do that in the most efficient way possible without contributing to the proliferation and burden of multiple supply chain	Thank you for your comment, we will take it into consideration as the Framework is further developed and improved.
207	Line 164: Avoid using antibiotics important in human medicine as first line therapy: Avoid using, as the first antibiotic, those medications that are important to treating strategic human or animal infections. As I wrote in February, this statement, while well meaning, is controversial and should be removed. There are meta-analyses that suggest that initially using the most effective antibiotic that results in a cure may actually lead to an overall reduction in antibiotic use. In any case, Guideline 2 (consulting with a veterinarian) is sufficient to ensure that the appropriate antibiotic is being selected for the particular situation.	We agree that maintaining a Veterinarian-Client-Patient Relationship (VCPR) is a top priority to help ensure the proper and judicious use of antibiotics. We also appreciate your comment about "Avoid Using Antibiotics Important in Human Medicine As First Line Therapy." and this sentence is embedded in the cattle industry's judicious use guidelines.
208	Line 166 – 173: practices #4 - #7 are more appropriate for veterinarians than producers and restatement of BQA language would better serve the messaging here.	The 14 Guidelines included are all part of the BQA Antibiotic Stewardship for Beef Producers Manual, published by BQA.
209	Line 188, Antimicrobial Use practices: Number 14 should read "Sub-therapeutic antibiotic use is discouraged, and is illegal if using in-feed antimicrobials."	The 14 Guidelines are incorporated from the BQA Manual Antibiotic Stewardship for Beef Producers.
210	Line 193 - compliance NOT COMPLIANCES	Suggestion was included.
211	Line 194: recommend deleting the statement using the word "abuse". While there are certainly bad actors in every industry and the issue of husbandry and animal handling cannot be overlooked, this document should not call attention to better practices by using language that is overly simplified and infers abuse is commonplace.	The word "abuse" was kept; while we agree with your assessment of how it reads, abuse is a clearly defined term with less potential for misunderstanding.
212	Line 201, waste diverted from landfill. The key to this is defining the boundaries of what this includes. I can include all rendered product and make this look really good. A more absolute measurement would be on-going reduction of waste sent to the landfill.	In regard to Efficiency & Yield metrics for the packer/processor sector there are some legal limitations in our discussions. The USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Additionally, the metrics are intended as guidance for self-evaluation. There is no requirement that anyone report anything to anyone. We have edited the language to clarify what type of waste we are referring to, with a definition in the Critical Key Terms Section as well.

213	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.	The Retail/Food Service Sector has a list of critical definitions within the PDF document. The online version of the Sustainability Framework does contain a glossary section, however our Critical Definitions were not included in the first version. Critical Definitions are now included in the Sustainability Framework. Based on feedback similar to yours, we have a hyperlink to a glossary of all critical definitions in the Table of Contents. If there are additional terms that need to be defined, please let us know.
214	Line 23 Auction Market - Air and Greenhouse Gases: Packer Fed Cattle Market Share - Should be Tyson Fresh Meats, Inc. IBP is the brand - the company no longer exists.	We have made the change.
215	Line 24, Figure 1 in Overview section: This line should read "Percentage of fed beef slaughter by major packing companies in the United States."	We have made your suggested edit.
216	Line 24, Retail/Food Service Metric Development: Add "to" between "looking" and "take."	We have made this adjustment.
217	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.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability and has utilized and shown publicly available data, deemed relevant by each individual sector. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
218	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."	After further consideration, USRSB has decided to remove this section of content.
219	Line 266, air and GHGs. This section needs boundaries defined. It appears in some parts that the intended boundary is within the plant walls, and in others it is open ended. General: Because the majority of environmental impacts for beef are tied to the value chain, the Levels could be set up as: Level 1 facility, Level 2 corporate, Level 3 includes	Thank you for your comment. The scope is defined under the "Responsible Party" section. Level 1 and 2 metrics are facility; level 3 metric is required at a corporate and/or facility level.
220	Line 309, Air and Greenhouse Gas Emissions Metric section: This sentence states packers and processors should publicly disclose their CO2 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.	Each sector has the responsibility for its own metrics and guidelines. As a sector, the Packer/Processors identified this as a Level 3, or aspirational goal for those that are further along on the sustainability journey. There is no requirement that anyone report anything to anyone, this is an identification of a metric that a company might want to take on to demonstrate their commitment to sustainability.
221	Line 349, Land Resources Metric section: Some of the text appears to be missing in this section.	Thank you for catching this. We corrected it during the comment period.
222	Line 353: These questions seem repetitive, if a feedyard has a NPDES they will meet all these requirements. Duplication and verification of each specific line item in the nutrient management plan of any state requirement in essence is not more efficient for the feedyard. 1. Question in guidance: Do you maintain and implement an SOP for other? What does other mean? 2. Land Application question: Is a phosphorus (P) Index or other P risk assessment conducted prior to land application of manure/effluent? Is this intended to be annual guidance?? 3. Land application question: Have you completed an employee training on nutrient planning SOPs in the last 3 years? NE requirement is every 5 years. It is important not be	We agree with your recommendation to simplify the supporting question response structure and explain these elements are part of NPDES permit requirements. This section has been revised to allow a feedyard to answer one question regarding whether or not an NPDES permit is in place. If so, it is not necessary to continue through the remaining questions in this section.
223	Line 412 – 417: this language is counterproductive to the positive and justifiable statement made in lines 407 – 411 regarding the incorporation of technology in the beef industry. It is the producer's responsibility to understand the marketing avenue they choose and adoption of technology should be encouraged and lauded.	We have adjusted these paragraphs to further clarify.
224	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."	Thank you for the comment and importance of specifically referencing the need for a valid VCPR. This section has been revised to add additional language and emphasis on VCPR.
225	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.	We have made the change.
226	Line 497, Table, Level 2, "Does the company have policies that encourage adoption of USRSB metrics and enable suppliers to find alternative uses for safe, wholesome, surplus products?": No USRSB metrics for the other sectors incorporate the concept of food waste. Since the other sectors are not dealing with food waste, this would not come up and should be deleted. In cow-calf and feedyard, the only time an animal would not be directed towards slaughter is if the animal is unhealthy. At the packer/processor level, every part of the animal is used; if not for food, for skins, pharmaceutical products, or other uses. Food waste is a concept that applies only to this sector, so referring to USRSB metrics for food waste in other sectors does not make sense.	For the Retail/Food Service Sector, efficiency and yield is most impacted by waste because we are users of the product.
227	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).	The requirements for employee safety efforts at feedyards are clearly outlined in many of the cattle feeding industry's employee safety resources and training materials.
228	Line 530, Employee Safety and Well-Being section: Rather than "...still opportunity for improvement," the statement should read "...always opportunity for improvement."	We have made the change.
229	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.	We have made the change.
230	Line 576: X recommends changing continuous monitoring (an unusual thing) to regular and repeated monitoring, which is more practical and generally adequate for making decisions about management changes.	USRSB agrees with this edit and has made the appropriate change.
231	Line 599: The phrase without a proper stocking rate is difficult to interpret. X recommends changing this to without calculating and monitoring stocking rates or similar language. This section should specify range-science-based technical assistance from NRCS or other range management professionals in calculating appropriate stocking rates for pastures and entire ranches.	USRSB agrees with this edit and has made the appropriate change.
232	Line 646- 649: X recommends adding, including monitoring and adaptation, after regular evaluation in line 647.	USRSB agrees with this edit and has made the appropriate change.
233	Line 650 – 667: suggesting resources for producers to gain information and expertise necessary when considering management changes is critical. However this list of recommended resources contains only two unbiased groups and those are USDA and Cooperative Extension. It is very risky for our industry to rely on NGO information to be fair and consistent with overall operational improvement outside of the area of their respective special interests.	Based on your comment, we have increased the quality of the resources provided. As the Framework will continue to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.
234	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.	We have removed the term "foundational commitment" from the Land Resources introduction, and added the new Level II metric to address our Sector's commitment to maintaining intact grasslands.

235	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.	You are correct that the overview shows the Level III land metric, but it is not shown in the detailed report. Thank you for pointing out this error - we will make this correction.
236	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.	We believe the inclusion of a defined scope in this Indicator helps clarify the metrics; the Retail/Food Service Sector includes U.S. based companies that have domestic and international beef supply chains. Recognizing that retail and food service providers seldom have direct influence on significant land resource impacts through their operations, the Retail/Food Service Sector’s Land Resources metrics and sustainability assessment guide focuses on a company’s ability to influence in its supply chain. Deforestation has been identified as a risk associated with land use change due to beef production in many international markets. Since many US retailers and food service providers have international supply chains, it is important that the retail metric address this detrimental issue. Furthermore, this is an issue shareholders are asking publicly traded companies to address in their beef supply chains.
237	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.	We believe the inclusion of a defined scope in this Indicator helps clarify the metrics; the Retail/Food Service Sector includes U.S. based companies that have domestic and international beef supply chains. Recognizing that retail and food service providers seldom have direct influence on significant land resource impacts through their operations, the Retail/Food Service Sector’s Land Resources metrics and sustainability assessment guide focuses on a company’s ability to influence in its supply chain. Deforestation has been identified as a risk associated with land use change due to beef production in many international markets. Since many US retailers and food service providers have international supply chains, it is important that the retail metric address this detrimental issue. Furthermore, this is an issue shareholders are asking publicly traded companies to address in their beef supply chains.
238	Line 74: After the sentence ending with herd productivity, please add the following new sentence: The cow-calf sector has zero tolerance for cattle abuse or mistreatment. Lines 153 to 189: Please use the AABP guidelines as written, rather than re-writing them. Specifically, use the language in this PDF file: http://www.aabp.org/resources/aabp_guidelines/AABP_Prudent_Antimicrobial_Use_Guidelines-2013.pdf . It causes confusion when the USRSB SAGs refer to the AABP as guidance, but then use different terms in the SAG, itself. Alternatively, simply direct readers to the AABP guidelines and refrain from repeating them in this document. Note that for the BQA standards cited in lines 77 to 110 in this cow-calf sector document, the BQA standard is described and incorporated by reference, and is not repeated or re-stated. If the USRSB decides to not use AABP as written and wishes to retain this customized language, at a minimum, we recommend re-writing the following practices as shown below to be more in line with AABP guidance (note, this is consistent with what we recommend in the Feedyard sector SAGs): - Practice 2: Select and Use Antibiotics Carefully: Consult with your veterinarian on the selection and use of antibiotics. Have a valid reason to use an antibiotic. Therapeutic alternatives should be considered prior to using antimicrobial therapy as appropriate, and the veterinarian should base actions and recommendations on strong clinical evidence. - Practice 4: Use Strong Clinical Evidence to Help You Select Antibiotics: The veterinarian should base actions and recommendations on strong clinical evidence of the identity of the pathogen causing the disease using clinical signs, history, necropsy examination, laboratory data, and past experience. - Practice 6: Avoid Inappropriate Antibiotic Use: Confine therapeutic antimicrobial use to appropriate clinical indications. Antimicrobials should be used to achieve case-specific clinical outcome(s) such as fever reduction, return of clinical signs to normal, or to reduce shedding, contagion and recurrence of disease. - Practice 8: Treat the fewest number of animals possible: Limit antibiotic use to sick or at-risk animals. Promptly remove chronic cases from the herd.	The statement: "Animal abuse is not acceptable under any circumstances" has been added. The USRSB has revised this section to only reference the 14 Judicious Use Guidelines, from the BQA Manual Antibiotic Stewardship for Beef Producers; and has used them verbatim in the Framework - which has been clarified.
239	Line 740 – 741: it is imperative that management of soil fertility and forage resources are high priority for the vast majority of cattle producers in the United States. It is also difficult to point to any one management tool as being the single most important influencer in sustainability. Therefore we do not agree with the statement that Grazing Management Plans are the most useful land management tool – particularly given the reality that much of the grazed land in the country is leased under variable term and input restrictions that make investment holistically impossible. We suggest the tools of a Grazing Management Plan being more appropriately labeled as collectively important towards the goals of overall sustainability.	We agree that GMPs are a critical means for establishing a variety of grazing operation goals and identifying tools and processes by which the goals are measured and achieved. We further believe that the metric of a GMP is the best tool to utilize as a metric for this indicator.
240	Line 753: wildlife management considerations are overly burdensome now given the array of local, state and federal mandates reflecting wildlife conservation and habitat interests. Many of these regulations limit land carrying capacity for cattle. If a producer wishes to supplement their operational income and improve land use through wildlife management for activities such as hunting or easements then we support that individual choice. Increasing wildlife carrying capacity again overemphasizes the value of a Grazing Management Plan as useful when the complete list of factors are considered and acted upon.	USRSB disagrees. Sound grazing management consistently benefits long-term beef production in tandem with wildlife habitat conditions in the vast majority of cases. Certain species requirements may not always be compatible with certain grazing operational goals, but the compatibility of wildlife and agronomic benefits of good grazing management is a reasonable assertion.
241	Line 761-764. X recommends that the list provided here be made consistent with the list beginning on line 653, or that the lists be combined in some fashion for consistency and clarity.	Changed as suggested.
242	Line 840: Neither improved management nor range condition necessarily leads to significant or meaningful additional carbon sequestration. X recommends change to maintained or improved.	On line 840 and all other similar lines, we have amended "Increased" to "Maintained or improved."
243	Line 938, Employee Safety and Well-Being Guidance to Achieve the Metric: Number 4 should recommend documenting participation in trainings.	We have made the following edit to line 938: "Participate in and document trainings".
244	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.	The cow-calf sector chose a stockmanship and safety program implementation metric because it has the greatest chance of adoption and to improve Employee Safety & Well-being.
245	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.	Thank you for reviewing the Animal Health and Well-Being section of the Retail/Food Service Sector SAGs and for pointing out the error on line 982 – we have made this update. For audits that are deeper into the beef cattle supply chain such as a feedlot audit, on-farm audit, etc., we would like to have the Beef Quality Assurance standards remain referenced as a tool for audits as BQA supports best management practices. We have updated the language in lines 982 to say "The audit should be based on widely recognized NAMI standards. For audits that dive deeper into the beef supply chain to the feedlot and on-farm audits, we recommend utilizing best management standards from Beef Quality Assurance as an audit assessment
246	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.	Each sector has the responsibility for its own metrics and guidelines. As a sector, the Packer/Processors identified this as a Level 3, or aspirational goal for those that are further along on the sustainability journey. There is no requirement that anyone report anything to anyone, this is an identification of a metric that a company might want to take on to demonstrate their commitment to sustainability.

247	<p>Lines 1412 to 1417: We appreciate the recognition of the difficulty in tracking and measuring Scope 3 (supply chain) carbon emissions. Note that the use of CDP or other tools for GHG tracking and measurement are not a part of any other sector. If an entity in the Retail and Foodservice sector chooses to use these tools to track water use metrics in the beef supply chain, that means that people who own Auction Yards, Feedyards, and Packer/Processor facilities would need to report on their carbon emissions through one of these platforms. While we understand that this could indeed be an outcome in a business-to-business relationship, we'd like to emphasize that a fundamental tenant of USRSB is that one sector does not mandate business practices to another sector, but that we arrive at these collaboratively. If Retail and Foodservice sector members chose different approaches, for example (such as one using CDP, while another uses a home-grown survey), then producers within the supply chain may be required to keep documentation in multiple formats for different sustainability calculators. We must be cautious that we are not creating additional, undue burden on the members of the supply chain. It would be unfortunate if the outcome were a multitude of tools that are enforced upon the supply chain through the auspices of USRSB. While we do not have a solution at this time, we suggest that the USRSB take this under additional consideration to gain more specificity and limits around what the Retail and Foodservice can require for supply chain reporting. Carbon emissions are important to address and climate resilience is an issue for agriculture, and we recognize the need to address it. However, we want to do that in the most efficient way possible without contributing to the proliferation and burden of multiple supply chain sustainability surveys.</p>	<p>Our customers, shareholders and other external stakeholders expect us to work with our suppliers to drive continuous improvement. In order for these metrics to be relevant to Retail/Food Service operators, the metrics must meet the needs of the stakeholders and customers we interact with on behalf of the whole beef value chain. The USRSB is a voluntary association with many indicators of success and using tools to track improvements in a retailer's scope 3 emissions are voluntary for the various retailers and each member of their supply chain. At this time, we will leave the Level 3 indicator in Air & GHG Emissions section of the Retail/Food Service SAG as a marker of continuous improvement and will rely on the on the retailer to create a plan to engage their full supply chain and track progress.</p>
248	<p>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.</p>	<p>We agree this is an important topic, and the industry is continuing to update guidelines for transportation of livestock through the BQA Transportation Program. We have added additional content in the cow-calf, auction market and feedyard sectors to incorporate a description and links to the BQA Transportation Program that was recently updated for both professional cattle haulers (tractor-trailer) and stock trailer</p>
249	<p>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."</p>	<p>We have made the change.</p>
250	<p>Lines 431 to 441: Please add stronger language regarding zero tolerance for animal abuse or mistreatment. This is about more than having a policy in place; it is about the attitude that accompanies the policy.</p>	<p>The section has been edited to make it stronger with reference to zero tolerance for animal abuse and mistreatment.</p>
251	<p>Lines 437 to 469: Please use the AABP guidelines as written, rather than re-writing them. Specifically, use the language in this PDF file: http://www.aabp.org/resources/aabp_guidelines/AABP_Prudent_Antimicrobial_Use_Guidelines-2013.pdf. It causes confusion when the USRSB SAGs refer to the AABP as guidance, but then use different terms in the SAG, itself. Alternatively, simply direct readers to the AABP guidelines and refrain from repeating them in this document. For the BQA standards cited in lines 412 to 431 of this Feedyard sector SAG, the BQA standard is described and incorporated by reference and not repeated or re-stated. If the USRSB decides to not use AABP as written and wishes to retain this customized language, at a minimum, we recommend re-writing the following practices as shown below to be more in line with AABP guidance (note, this is consistent with what we recommend in the Cow-Calf sector SAGs; we also recommend numbering the practices like in Cow-Calf rather than the bullet list here for ease of reference in the future when the documents are finalized): - Practice 2: Select and Use Antibiotics Carefully: Consult with your veterinarian on the selection and use of antibiotics. Have a valid reason to use an antibiotic. Therapeutic alternatives should be considered prior to using antimicrobial therapy as appropriate, and the veterinarian should base actions and recommendations on strong clinical evidence. - Practice 4: Use Strong Clinical Evidence to Help You Select Antibiotics: The veterinarian should base actions and recommendations on strong clinical evidence of the identity of the pathogen causing the disease using clinical signs, history, necropsy examination, laboratory data, and past experience. - Practice 6: Avoid Inappropriate Antibiotic Use: Confine therapeutic antimicrobial use to appropriate clinical indications. Antimicrobials should be used to achieve case-specific clinical outcome(s) such as fever reduction, return of clinical signs to normal, or to reduce shedding, contagion and recurrence of disease. Practice 8: Treat the fewest number of animals possible: Limit antibiotic use to sick or at-risk animals. Promptly remove chronic cases from the herd. Line 471, Table, Rows 2 and 3: The topic of animal abuse needs more emphasis and expanded description than these two short lines. Animal abuse is fundamentally incompatible with everything else in this document, and should be a non-negotiable tenant of USRSB. Line 471, Table, Row 15: The topic of animal abuse needs more emphasis and expanded description than these two short lines. Animal abuse is fundamentally incompatible with everything else in this document, and should be a non-negotiable tenant of USRSB. This paragraph does not match the lead-in sentence for Carcass Disposal. The paragraph covers a range of topics far beyond how to dispose of a carcass. Suggest the paragraph be deleted.</p>	<p>Thank you for the detailed comments and clarification necessary to help ensure alignment of our work with the American Association of Bovine Practitioners (AABP). Currently, the 14 guidelines are part of the BQA Manual entitled "Antibiotic Stewardship for Beef Producers," where were developed with the AABP language in mind. The guidelines were "adapted from AVMA, AABP and AVC Appropriate Veterinary Antibiotic Use" (as stated in the manual). The USRSB has revised this section to only reference the 14 Judicious Use Guidelines, from the BQA Manual Antibiotic Stewardship for Beef Producers; and has used them verbatim in the Framework - which has been clarified.</p> <p>The issue of zero tolerance for animal abuse is already included in the sustainability assessment guide in the section on "Guidance to Achieve the Metric."</p>
252	<p>Lines 448-49, Animal Health and Well-Being Metric section: The question should read "Does the company use 2nd or 3rd 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.</p>	<p>We have made the change.</p>
253	<p>Lines 536-538: X recommends deleting these lines and combining the preceding and following lists. The current structure is both redundant and confusing, because the lists contain similar elements, but in different orders and at different levels of specificity. For example, they could be combined in the following way: 1. Assess current resource conditions (e.g., make a ranch inventory) relative to potential optimum conditions. 2. Set ranch goals and objectives designed to move conditions toward optimum. 3. Select management actions to achieve goals (e.g., stocking rate, timing, duration, rest, intensity, pasture size & number). 4. Make contingency plans for drought and other risks. 5. Conduct regular and repeated monitoring of key indicators, and compile resulting information. 6. Take actions or make operational adjustments based on monitoring results.</p>	<p>USRSB agrees that this section is redundant and confusing. We have made the edit as recommended.</p>
254	<p>Lines 548-551: X recommends that the term may be changed to should or will in order to clearly create an expectation that GMPs will address the Land Resource Indicator definition, including biodiversity.</p>	<p>USRSB concurs that biodiversity is an important component of GMP's. We will edit the language to say "should" rather than "may"</p>
255	<p>Lines 662 to 665: This statement opens the door to retailers and food service companies adding policies beyond we have agreed to in USRSB. Please clarify that this influence in the supply chain will continue to be exercised through the USRSB, and not through additional requirements beyond this collaborative process that may not be grounded in good science.</p> <p>Line 680: Typographical error on "These"</p> <p>Line 697, Entire Table, all three levels: As described in the introduction to this section, deforestation is more of an issue in global beef sourcing than within the United States (see Lines 667 through 673).</p> <p>The Retail and Foodservice sector is also concerned with conversion of grazing lands to row crops (see Lines 675 to 683). We deeply appreciate that the Retail and Foodservice sector recognizes the valuable ecosystem services that intact grazing lands provide (see Lines 659 to 662). Given this context, we suggest that the guidelines for the Land Resources Metrics be expanded to promote conservation of existing rangelands to achieve the desired outcome of "Preservation of the biological resources dependent upon land that is currently being grazed" (see Line 699). According to the American Farmland Trust (https://www.farmland.org/), 31 million acres of agricultural land were lost between 1992 and 2012, primarily as a result of suburban development in the United States. That's 175 acres an hour, or 3 acres every single minute. Not only does this loss push farming and ranching from high-quality lands that have accessible water supplies (cost-effective to develop) to more marginal land where yield efficiency becomes a challenge, this impact creates substantial risks to ecosystems and watersheds. Paving over working landscapes increases runoff and depletes local watersheds, in addition to losing valuable habitat that farm and rangelands support. Further, as farming gets pushed further out, we begin to lose the very thing this metric seeks to preserve: open space currently used by wildlife and native species. We would like to see the retail and food service sector be more proactive in not just preventing loss through deforestation around the globe, but encouraging preservation of existing farm and rangeland right here, within the United States. With their reach of operations and influence, members of the Retail and Foodservice sectors could become powerful allies for the American Farmland Trust or similar groups that seek to develop policy and financial instruments to maintain farm and rangeland as working landscapes. Moreover, this can be done right now in the US, and would make a significant, positive contribution to the beef supply chain.</p>	<p>Thank you for your comments. The Retail and Food Service sector reviewed them but and made minor changes but determined no major shifts were needed to the SAG.</p> <p>The typographical error was corrected.</p> <p>The Level 5.2.2b metric addresses the concern with conversion of greenfields to urban development, but the Retail and Food Service sector will consider the conversion of grazing lands to row crops in future revisions of the Framework.</p> <p>The LEED standard is referenced in line 4084</p>

256	<p>Line 763 to 766: Use of the LEED standard would be applicable if it is used to reference preservation of farmland and rangeland (that is, not allowing urban development into areas identified as primary for agriculture). For example, in LEED version 4, Location and Transportation, developments may earn a LEED credit for avoiding land that is NOT classified as Prime Farmland (https://www.usgbc.org/node/2615509?return=/credits/new-construction/v4/location-%26amp%3B-transportation). The definition for prime farmland is as follows: Prime farmland, unique farmland, or farmland of statewide or local importance as defined by the U.S. Code of Federal Regulations, Title 7, Volume 6, Parts 400 to 699, Section 657.5 (or local equivalent for projects outside the U.S.) and identified in a state Natural Resources Conservation Service soil survey) or local equivalent for projects outside the U.S.). This definition could be added to the Critical Definitions section beginning with Line 775 in this SAG. Please note that Brandy Wilson, Sustainability Director at the J.R. Simplot Company, is a LEED Accredited Professional and could offer more context for this, if the retail and food service sector would like to explore the utility of the LEED criteria in more depth. Line 766: Please add a new paragraph to the SAG to address the fact that limiting greenfield development has a positive policy element of preventing loss of farmland that could be implemented. Consider the following language as a starting point for discussion, adapted from the American Farmland Trust Farms Under Threat report: Agricultural land in the continental United States encompass roughly 912 million acres of non-federal land, including cropland, pastureland, rangeland, and woodland associated with farms. This agricultural land provides a rich and varied landscape that is part of a larger mosaic of land cover/uses, including forestland, federal land, federal land grazed by livestock, and other rural land, as well as urban and low-density residential development. About 31 million acres of agricultural land were lost between 1992 and 2012, primarily as a result of suburban development in the United States. That's 175 acres an hour, or 3 acres per minute. If these losses continue, farming and ranching, by necessity, will be pushed into greenfields where the soil and water are not as robust, and more ecosystem services could be lost. A greenfield policy should include actions to keep high-value agricultural lands in production by engaging in public processes to develop an agricultural land protection platform, contributing towards ongoing monitoring of agricultural land losses, and helping to preserve critical farmlands when possible by supporting land trusts or other applicable organizations.</p> <p>Lines 775 to 780: Please adjust the definition as follows to address conversion of farmland to urban uses, which is also not a desirable outcome if we want to protect natural areas: Conversion: Transformation of land uses to progressively more intensive human uses. Conversion can take place if natural or semi-natural vegetation (such as a forest) is converted to intensive agriculture or urban uses. Conversion can also occur when agricultural farmland or rangeland uses are converted to suburban or urban uses. Ecosystem service values are typically degraded or lost through conversion, and it may be difficult, costly, or infeasible to fully restore (SER 2004, FAO 2000, Peet and Roberts 2013). Line 789: Please add a definition for Ecosystem Services, as follows: Ecosystem Services: Generally, the benefits that people derive from ecosystems, such as the pollination of crops, prevention of soil erosion, and water purification. Ecosystem services can be grouped into four broad categories: provisioning, such as the production of food and water; regulating, such as the control of climate and disease; supporting, such as nutrient cycles and oxygen production; and cultural, such as spiritual and recreational benefits. Understanding and placing a monetary value on these services could help to increase preservation of landscapes that provide such services (Millennium Ecosystem Assessment, maybe this is more meaningful</p>	<p>Thank you for your comments. The Retail and Food Service sector reviewed them but and made minor changes but determined no major shifts were needed to the SAG.</p> <p>The typographical error was corrected.</p> <p>The Level 5.2.2b metric addresses the concern with conversion of greenfields to urban development, but the Retail and Food Service sector will consider the conversion of grazing lands to row crops in future revisions of the Framework.</p> <p>The LEED standard is referenced in line 4084</p>
257	maybe this is more meaningful	We appreciate your support.
258	maybe use "facility" instead of "plant" in the list line.	We have made this clarification.
259	<p>measuring the impact or outcome or efficiency of anything in relation to sustainability is a dangerous game of assumptions. For example: under efficiency definition..your example of a kilogram of beef per liter of water.....Assuming that it takes 2000 gallons of water to produce a pound of hamburger has gave beef a very inefficient reputation. How can you compare the efficiency of a live animal that produces a thousand other products besides the burger, with the same 2000 gallons of water? Not to mention for every ten gallons of water she drinks she returns very good fertilizer in urine and manure about 8 to 12 pounds daily in a natural biological form? Is your amount of output a fair measure of efficiency? Does the same pound of vegetables, that requires less water to produce, also produce a thousand other products at the same time? Does it add the same good biological fertilizer...or act as a decomposer of unusable vegetation? How many pounds of vegetables would carry the same nutrient density as a pound of beef? For the most part our hamburger doesn't even come from a feedlot steer fed corn, it comes from a lot of unfattened cattle? Would that change the water impact of hamburger if they threw out all the corn supposedly consumed? So how are all these other factors weighed in output to input efficiency? Its stupid to say raising a pound of radishes is more environmentally friendly than a pound of beef. Assumptions are a human tendency that has lead man down many erroneous roads.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. This section also includes an expanded discussion of the LCA.</p>
260	<p>Members and stakeholders of the US Roundtable for Sustainable Beef: Thank you for this opportunity to comment on your recently released sustainability framework. I appreciate you all taking the time to engage with those of us seeking improvement to the framework, and for making this an iterative process of improvement. It is very encouraging to see such a diverse array of people on the framework who are all coming together to make the beef industry more sustainable for all of us. I am a researcher in an academic setting at the University of California, Berkeley, and formerly at Michigan State University. My expertise lies within sustainable beef systems- including greenhouse gas emissions, soil carbon sequestration, and ecosystem services (see my recent publication here: https://www.sciencedirect.com/science/article/pii/S0308521X17310338). While I acknowledge the immense amount of time it must have taken to get to this point in the framework, I do have some general feedback and concerns. I hope that you will incorporate some of this feedback as you move forward in improving the framework. I look forward to seeing progress made and hope that we can come together as a community to ensure that the future of US beef production is indeed sustainable. I have added specific in-line comments throughout the framework in addition to my more general feedback below (in order of importance). 1. Market concentration. In the feedyard section of the framework, you highlight that smaller operations containing fewer animals have increasingly been displaced with fewer, but larger feedyards. USRSB attributes this to the beneficial outcomes of economies of scale and worker training. This alludes to, but fails to address, the underlying issue of corporate consolidation and market control embedded within the beef industry at large (of which, the US is a vital component). I am glad to see that many of these corporations are represented by the USRSB, which indicates that they are all interested in addressing sustainability within their respective operations. However, the previous actions by these groups have largely been counterproductive to progressing sustainability within the framework. Examples include the collaborative push from these organizations to withdraw the GIPSA rule, lobbying against federal and state greenhouse gas regulations, and supporting increased line speeds that are detrimental to worker well-being. The beef industry within the US is overwhelmingly concentrated, leading to very few corporations with high market power and regulatory influence. USRSB should more directly address this within the framework to ensure that academics, scientists, NGOs, and others involved in beef sustainability have</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Engagement of the USRSB in business-to-business ventures and engagement in regulatory affairs and legislative lobbying is out of scope for the USRSB.</p>
261	Metric I think there is a typo Are all individuals who are involved in the operation trained and (should be in)	We have amended the metric: Are all individuals who are involved in the operation trained in stockmanship and safety and implementing these practices on the farm or ranch?
262	Might be helpful to also say that the stocking rate differs geographically based on type of forage, season, annual rainfall, invasive plants, and many other criteria.	Changed as suggested.
263	Missing a period on last sentence of the Purpose section :)	We have made the correction.
264	Monitoring progress section: This may include soil, forage, water, air, ecosystem health, and wildlife habitats measured prior to adopting a GMP and annually.	Monitoring is included in the discussion around a GMP.
265	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.	Based on your comment, we have improved the organization / location of the references. As the Framework will continue to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.

266	Most importantly, it is critical that USRSB members agree and communicate clearly to the public and consumers that this Framework is an early iteration, a starting point - and that it will evolve and become more rigorous and outcomes-focused over time. The current Framework focuses on practices and intermediate outcomes; we will advocate and support USRSB in developing future versions of the Framework that include more rigorous and detailed Indicators, Metrics, and Sustainability Assessment Guidelines, including quantitative measures. This will establish foundations for business-to-business, market-driven certification and verification programs that are based on the USRSB Framework, and help ensure the credibility and utility of the USRSB endeavor.	Thank you for your comment. The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
267	Must take into consideration applicable state laws for reuse, conservation etc. These differences are significant and could affect overall perception of improvement, etc. If state law preempts reuse, as an example, then that metric but be removed for consideration.	Thank you for the comment and the need for us to clarify the importance of abiding by applicable laws and regulations. Language was added to clarify that all types of operations are expected to operate within the boundaries of federal, state and local regulations and that nothing in the USRSB documents is intended to contradict nor take precedence over those regulations.
268	My take on this is more control from the top. JBS will have us by the short hairs if this goes through! I guess we no longer need Packers and Stockyard Act that served us so well so long. Remember, we defeated the Beef Checkoff twice, but the packers and feedlot operators got it written into the farm bill. They are now trying to open the gates for imported cattle and beef. Keep on with this direction of top control and watch the end of top quality beef, readily available, and reasonably priced shall end without ever being able to revive the industry as we know it. Bottom up competition has built the cattle industry to the best beef in the world. Country of Origin labeling proved that statement. Top down control is already ending the cattle industry that was built with hard labor from dedicated souls that loved their work. The era is fast leaving and never to return. Foreign beef forced on the public benefits a select few's wealth and not the US producer or US customer benefit.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Currently, more than fifty percent (50%) of the USRSB membership are producer or producer associations. To date, cattle producers have been very supportive of the effort and are looking at the USRSB Framework as a resource for producers who are looking for continuing opportunities on how to improve their operations overall. It is and will remain a voluntary effort to help improve the sustainability of U.S. beef production.
269	Nearly 800 million acres of American lands are used for grazing (cow-calf phase, including stocker/backgrounder operations). Poor grazing management causes major environmental harm including: - soil erosion and compaction and resulting declines in fertility, soil carbon, and water holding capacity; - freshwater depletion and pollution; - emissions of heat-trapping emissions, especially methane and nitrous oxide; - habitat degradation, species endangerment and biodiversity loss; - heightened vulnerability to drought and extreme weather; - weed invasions that are often controlled using toxic herbicides harmful to native plants, wildlife, and public health; and - conversion of native grasslands to irrigated pasture and hayfields.	When grazing is done right, it can provide tremendous benefits. By promoting and implementing GMPs we know those benefits can be achieved.
270	Need to clarify this sentence (i.e. Other than ionophores, subtherapeutic antibiotics for growth promotion should be discouraged. If used they should be limited to use for disease control and prevention.	In the U.S. today, no antibiotics important in human medicine are used to improve feed efficiency or growth promotion in beef cattle. In addition, there are no antibiotics labeled for disease prevention in beef
271	new first graph	We are not clear what graph you are referring to. There is no graph currently included in the Cow-Calf Air and Greenhouse Gas Emission section. Please comment again during the second comment period with further clarification on which graph you a referencing.
272	Nice approach.	Our sector established a tiered approach to the metrics that allows for continuous improvement. We have written the metrics to allow operators of all sizes to participate to the degree of their business interests. The USRSB is a voluntary commitment and each business has the right and responsibility to decide what level of continuous improvement they want to achieve for their business objectives.
273	Nice, includes improves economic bottom line.	We appreciate your support.
274	No regulations will make animal slaughter "socially responsible." Animal health and wellbeing is not a priority so long as the beef industry participates in slaughter for profit. Please consider investing and switching to legitimately sustainable food production; cultured meat and plant based eating.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability, and supports the beef industry including all value-chain participants.
275	No regulations will make animal slaughter "socially responsible." Animal health and wellbeing is not a priority so long as the beef industry participates in slaughter for profit. Please consider investing and switching to legitimately sustainable food production; cultured meat and plant based eating.	USRSB is committed to improving the sustainability of U.S. beef production. This commitment entails an obligation to proper and humane animal handling and care, which is espoused in the metrics and guidance for the producer sectors across the Animal Health & Well-being metrics as well as the Employee Safety & Well-being metrics.
276	No regulations will make animal slaughter "socially responsible." Animal health and wellbeing is not a priority so long as the beef industry participates in slaughter for profit. Please consider investing and switching to legitimately sustainable food production; cultured meat and plant based eating.	USRSB is committed to improving the sustainability of U.S. beef production. This commitment entails an obligation to proper and humane animal handling and care, which is espoused in the metrics and guidance for the producer sectors across the Animal Health & Well-being metrics as well as the Employee Safety & Well-being metrics.
277	not all indicators have a big impact on each segment. that is the case with Auction markets. We support auction markets focusing on those areas they can impact. primarily animal care and employee safety	We appreciate your support.
278	nutrient management is important to feedyards and use of a nutrient management plan is a good fit for both land and water resources. where possible, existing tools should be use as metrics...most feedyards have a NMP or equivalent.	This is a good point and is similar to how we've focused on the development and implementation of Grazing Management Plans for the cow-calf sector, whereby the GMPs address multiple indicators -- land, water and air. Likewise, as you suggest here, we should recognize the value of NMPs across both the land and water indicators. Changes were made to recognize the importance that NMPs plan in addressing and improving both of the land and water indicators. Additional language and content on NMPs was added to the water resources section.
279	On line 306, the "GHG Protocol" is referenced, but it is unclear what this is.	A reference to the GHG protocol website has been added.
280	One desired outcome should be to reduce air emissions and GHGs.	We appreciate your efforts to evaluate the draft metrics in a real-world application through your pilot project. While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level

281	only one metric should be selected to ensure the framework is consistent.	The Packer/Processor sector opted to include a graduated set of metrics based upon degree of complexity and detail adopted by participating organizations. This approach to recognizing metric performance status within an indicator by using "Level 1, Level 2, Level 3" categories is useful for benchmarking the status of enterprises with pre-established measuring and reporting practices. From a sector level this creates a mechanism to improve performance for an enterprise across each indicator.
282	Only one metric should be selected to ensure the framework is consistent.	The Packer/Processor sector opted to include a graduated set of metrics based upon degree of complexity and detail adopted by participating organizations. This approach to recognizing metric performance status within an indicator by using "Level 1, Level 2, Level 3" categories is useful for benchmarking the status of enterprises with pre-established measuring and reporting practices. From a sector level this creates a mechanism to improve performance for an enterprise across each indicator.
283	Only one metric should be selected to match other sectors.	The Packer/Processor sector opted to include a graduated set of metrics based upon degree of complexity and detail adopted by participating organizations. This approach to recognizing metric performance status within an indicator by using "Level 1, Level 2, Level 3" categories is useful for benchmarking the status of enterprises with pre-established measuring and reporting practices. From a sector level this creates a mechanism to improve performance for an enterprise across each indicator.
284	Only one metric should be used to make consistent with the rest of the framework.	The Packer/Processor sector opted to include a graduated set of metrics based upon degree of complexity and detail adopted by participating organizations. This approach to recognizing metric performance status within an indicator by using "Level 1, Level 2, Level 3" categories is useful for benchmarking the status of enterprises with pre-established measuring and reporting practices. From a sector level this creates a mechanism to improve performance for an enterprise across each indicator.
285	<p>Our analysis, however, finds that the current USRSB framework will not help the U.S. beef sector—either individual producers or the entire industry—realize its great potential to minimize the severe environmental, climate, public health, animal welfare and other impacts of poorly managed cow-calf and feedyard operations. This is unfortunate because well documented research and evidence shows that well-managed ranches and farms can provide valuable benefits to society, including:</p> <ul style="list-style-type: none"> - reducing carbon pollution by storing it in the soil; - increasing soil fertility; - filtering rainfall runoff to maintain and restore water quality; - enhancing recharge of ground and surface waters; - conserving our natural heritage and protecting biodiversity; - reducing routine non-therapeutic antibiotics use that create antibiotic-resistant superbugs; and - providing valuable recreational opportunities and - increasing access to healthier, more humanely produced, nutritious food. <p>Most of these benefits are generated by well-managed grass-based and grass-finished livestock systems—yet the framework does not explicitly recognize, incentivize or otherwise support these far more sustainable grassbased and grass-finished systems.</p>	<p>The cow-calf sector chose metrics that had the potential for a high level of adoption and engagement by that sector, as well as a high positive sustainability outcomes impact on all three of the environmental indicators—land, water, and air.</p> <p>Regarding different types of beef production systems (i.e., grain vs. grass finishing) the mission and vision of the USRSB focuses on the environmentally sound, socially responsible and economically viable production of beef in the U.S., regardless of the type of production system. Each type of beef production should be evaluated under the auspices of the six high priority indicators. The USRSB guidance is intended to support and improve all forms of beef production. We have included language in the introduction section of this document to ensure that point is clear.</p>
286	Our comments below focus primarily on how the USRSB framework fails to address key structural issues related to sustainability and the most damaging impacts of the cow-calf and feedyard phases of production. However, our feedback also applies to all aspects of the framework and its inadequate approach for establishing effective incentive mechanisms, indicators, and performance measures. We also highlight USRSB's failure to create a plan of action to address corporate consolidation and other core policy and regulatory issues that remain barriers to advancing sustainability.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Regulatory affairs, legislative lobbying and engagement in business-to-business ventures is out of scope of the USRSB.
287	Our feedyard has been a member of the roundtable since it was formed in 2015. There are several reasons why we believe the USRSB has been successful and why we are supportive of the sustainability framework as currently drafted. Some of these reasons include: (1) the USRSB has stated it will do as well as what it will not do. We support the roundtable's effort to develop tools and resources for members of the supply to voluntarily utilize as they see fit. We also support the fact that USRSB has made a strong commitment to not attempt to become a certifying or auditing organization. As outlined in the roundtable documents, those types of programs must be left in the hands of business-to-business supply chain relationships; (2) allowing each segment of the supply chain to develop an approach most appropriate for their segment has been key to ensuring that members' voices are being heard. Creating this ownership by each segment of the supply chain has helped build confidence and certainty in process; (3) cattle feeders have worked diligently to improve the efficiency of our operations and remain economically viable. We have and will continue to focus on the other key areas identified by USRSB, which include animal health, nutrition and animal care and handling, environmental management for our water, air and land, and providing a safe workplace and supporting our rural communities. In our view, USRSB has developed the correct list of priorities for the beef supply chain; and (4) the draft metrics outlined in the framework for feedyards focus on the importance of developing and implementing plans and practices to address each sustainability indicator. We support this plan-based approach for the feedyard metrics, primarily because it gives feedyard managers the flexibility needed to address specific issues that are most appropriate for the scale of the operation, location,	We appreciate your support.
288	Our review copy of the packer/processor SAG did not include indicators and metrics for land resources. Appears a page or two is missing.	Thank you for catching this. We corrected it during the comment period.
289	Overall, I am pleased with the progress that the USRSB has made on this framework. I think we are heading in the right direction towards gathering data to prove that the US beef supply is sustainable and making improvements all the time. I am proud to be a part of this effort.	We appreciate your support.
290	Overall, the animal production metrics are straightforward, applicable, and implementable for operations of any size or location. Most of the metrics align with best management practices that are implemented by progressive and sustainability-minded cow-calf and feedlot managers.	We appreciate your support.
291	Overall, X supports the development of the Framework, and is pleased to see the end result has been developed as a voluntary tool for individual producers to utilize on their operations. Likewise, we are pleased the metrics chosen are applicable to any operation in the country but provides further details to allow a producer to make it relevant to their individual operation. X believes the key to realizing continuous improvement in the U.S. beef industry was to develop metrics that have a positive impact on sustainability outcomes while at the same time are technologically feasible, geographically neutral, and economically practical for producers. Without these three key elements, the metric will not be adopted or implemented. As presented the metrics as a whole will make a marked improvement in the sustainability of our industry if we can get them into the hands of producers and provide a value proposition.	The USRSB agrees getting the producer metrics and resources into the hands of producers is a critical piece to accomplishing our mission of continuous improvement in the sustainability of U.S. beef production. We are focusing on an outreach effort to develop the educational and resource tools necessary to carry out this mission.
292	Overall, X supports the development of the Framework, and is pleased to see the end result has been developed as a voluntary tool for individual producers to utilize on their operations. Likewise, we are pleased the metrics chosen are applicable to any operation in the country but provides further details to allow a producer to make it relevant to their individual operation.	We appreciate your support.

293	Overall, X supports the development of the Framework, and is pleased to see the end result has been developed as a voluntary tool for individual producers to utilize on their operations. Likewise, we are pleased the metrics chosen are applicable to any operation in the country but provides further details to allow a producer to make it relevant to their individual operation.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
294	Overall, X supports the development of the Framework, and is pleased to see the result has been developed as a voluntary tool for individual producers to utilize on their operations. Likewise, we are pleased the metrics chosen are applicable to any operation in the country but provides further details to allow a producer to make it relevant to their individual operation.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
295	Overall, X supports the development of tools and guidance that, on a voluntary basis from producer to farm to ranch, may be implemented within our industry to utilize. The opportunity presented by options such as these, accompanied by appropriate education, will certainly relate options for improved economic, production and environmental management to our stakeholders and industry partners.	Thank you for your comment.
296	Packer + Processor: Packers and Processors could have a very positive impact on sustainability through sourcing, and more attention to this opportunity could be given throughout.	We agree that sourcing can play an important role in driving positive sustainability impacts. Sourcing requirements or standards can be established by individual companies under B2B arrangements. The USRSB Framework is designed to guide beef value chain members to improve their own operations.
297	Packer '- As we responded to the metrics, we wanted to provide additional "proof points" for our responses. For example, when asked if we have a comprehensive animal welfare program including 3rd party verification, we would like share details of what that program includes. The pilot team is considering the development of a tool that would allow a packer to "check" all of the elements that apply to their program. This would offer a roadmap for continuous improvement if the packer did not address certain elements. - As we worked through the metrics, we felt there could be gaps in what a smaller and larger packer is able to respond to. The metrics in their current state, do not give consideration to the size and exposure of a packer. For example, smaller packers may not have programs in place to address water management, while larger packers would likely be able provide examples of best practices, investments in new technology, and trends in water use. Potentially the tiers need to be modified to allow for company size and exposure, which could assist in companies more readily adopting and applying the metrics.	The metrics were written as a starting point to address key sustainability indicators with the intent to keep them broad enough for the diversity of business models within the Packer/Processor Sector and to encourage adoption. Beyond the yes/no answer, we believe it is a business decision to identify how a company wants to proceed with the metrics and further develop their own sustainability targets.
298	Page 11 – Guideline 3 – “Avoid Using Antibiotics Important In Human Medicine As First Line Therapy.” This is controversial and should be removed. There are meta-analyses that suggest using the most effective antibiotic <u>that results in a cure</u> may actually lead to an overall reduction in antibiotic use. In any case, Guideline 2 (consulting with a veterinarian) is sufficient to ensure that the appropriate antibiotic is being selected for the particular situation.	We agree that maintaining a Veterinarian-Client-Patient Relationship (VCPR) is a top priority to help ensure the proper and judicious use of antibiotics. We also appreciate your comment about “Avoid Using Antibiotics Important In Human Medicine As First Line Therapy.” and this sentence is embedded in the cattle industry’s judicious use guidelines.
299	Page 12 - 3. Record training and educational activities	This suggestion was already made in the document that went out for public comment.
300	Page 12 - Cattle handling practices should be defined and communicated, in compliance with the recommendations of BQA (BQA, 2015; Grandin, 2015; OIE, 2017). Abuse of cattle is not acceptable under any circumstances.	This suggestion was already made in the document that went out for public comment.
301	Page 12- Guideline 14 - Sub-therapeutic Antibiotic Use Is Discouraged: Antibiotic Use should be limited to prevent or control disease. (Beef Quality Assurance)	This suggestion was already made in the document that went out for public comment.
302	Page 18 - Reproduction is fundamental to sustainability at the operation and entire beef value chain levels.	This suggestion was already made in the document that went out for public comment.
303	Page 20 - Animal health, well-being, and productivity greatly depends	This suggestion was already made in the document that went out for public comment.
304	Page 20 - Cooperative extension specialists and other land grant university personnel	This suggestion was already made in the document that went out for public comment.
305	Page 21 - However, consideration of the goals, objectives, and marketing realities of the operation should be considered	This suggestion was already made in the document that went out for public comment.
306	Page 51 - Feedyard operators can track their use of these resources and compare them to the outcomes of the tasks they are used to complete. (What does this mean?)	This change was already included in the document that was out for public comment.
307	Page 65 - Metric: Feedyard employees are trained in Beef Quality Assurance (BQA) principles and these principles are implemented at the feedyard.	This change was already included in the document that was out for public comment.
308	Page 66 – Indicator Metric Assessment Animal Health & Well-being Are feedyard employees trained in Beef Quality Assurance (BQA) principles and are these principles implemented at the feedyard? Proportion of US Feedyards who meet the criteria for the metric	This change was already included in the document that was out for public comment.
309	Page 66 - Training & management practices prevent animal neglect or mistreatment	This change was already included in the document that was out for public comment.

310	Page 67 - The U.S. Food & Drug Administration (FDA) requires feedyard operators to receive a written Veterinary Feed Directive (VFD)/prescription from a veterinarian for antibiotics important to human health to be used in feed/water (respectively) of cattle affected by a certain ailment. Feedyard operators must keep these records, so in the event of an FDA audit, they can show compliance.	This change was already included in the document that was out for public comment.
311	Page 68 - Employees should be trained on how to properly handle cattle in a way that supports their natural instincts.	This change was already included in the document that was out for public comment.
312	Page 8 - Metric: Adoption of Beef Quality Assurance (BQA) or similar program principles incorporated into management of the farm or ranch.	This suggestion was already made in the document that went out for public comment.
313	Page 8 – Under the “Metric Question,” principals should be replaced with principles	Suggestion was included.
314	Processor - On the Level 1 questions, they are yes/no. Is that really all you want? We ended up putting the “what we measured”. - Where do you differentiate between facility and company data? Does it matter since this is an internal assessment tool? Regardless, we need to give some guidance to the user as how to address the issue. - There may need to be some guidance for groups that are starting from scratch. How do you set a baseline? Do you just skip the question if you are not measuring something? - Finally, we had the advantage of me participating in the USRSB development of this information for the last couple of years. We need to focus on a concise, compelling paragraph as to why a business would want to even consider this effort.	The metrics were written as a starting point to address key sustainability indicators with the intent to keep them broad enough for the diversity of business models within the Packer/Processor Sector and to encourage adoption. Beyond the yes/no answer, we believe it is a business decision to identify how a company wants to proceed with the metrics and further develop their own sustainability targets. We do believe the metrics will develop over time and may include additional responses similar to what your comment has indicated.
315	profitability is a necessary indicator and must remain a key part of USRSB work.	During the indicator development process, the USRSB agreed to identify a group of six high priority indicators. When reducing the number from 13 to 6 (first round of indicator development reduced the number from 160 to 13), the group agreed unanimously that the indicators Consumer Perception, Transparency and Profitability should be considered crosscutting requirements across multiple indicators and would not be identified as one of the specific high priority indicators. In other words, the USRSB believes that profitability is foundational to all indicators. Additionally, the USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business. For food safety, similarly the group agreed that food safety was foundational for the viability of the beef supply chain, touching every facet of beef production, processing, distribution and consumption. Based on your comment we have included a Framework introductory section explaining the above process the USRSB took to develop the 6 high priority indicators.
316	Publishing a document with fancy zing words is simply another version of capturing what producers have been doing for generations. Producers have forgotten more than most people will ever know about how to properly care for their cattle, and although some people do use fancy databases, there isn't anything wrong with the way it has been done for many many years. The focus on "safe conditions" is ridiculous. If the conditions aren't minimally safe, the livestock will get injured or die. Livestock producers don't need a fancy organization to tell them how to keep their animals safe. Livestock producers don't utilize antibiotics Willy nilly, so the focus on "limiting their use" is already standard practice. Most producers also know their land better than anyone; but now, if they aren't consulting an expert or their extension service, they are now running a sub standard operation? Focus on HELPING US producers by highlighting how well we produce our product. US beef is covered but foreign meat is being imported at record setting rates with little to no marketing assistance for US product. Not to mention no effort to fight the lies of documentaries like "Cowspiracy" and it's lies and skewed research. Not to mention the attacks livestock producers are facing from animal rights minded people and new, unconstitutional laws for obscure and vague animal abuse, cruelty and neglect laws that can ruin a producer on accusations and opinions vs facts. If you want to talk about "sustainability" you need to advocate for the producers rather than play into the special interest and animal rights zealots. Or, there won't be any cattle producers left. You decide.	The USRSB is a collaborative effort whose mission is to Advance, support and communicate continuous improvement in the sustainability of U.S. beef production by educating and engaging the beef value-chain through a collaborative multi-stakeholder effort. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
317	Really picky grammar correction: Don't end this paragraph with a preposition. Instead end it..."and the needs of the people within and around the beef community."	Suggestion was included.
318	Recommendations that apply to the cow-calf phase 1. Invest in and support 100% well-managed grass fed beef operations. Many benefits can be generated by well-managed grass-based and grass-finished livestock systems—yet the framework does not explicitly recognize, incentivize or otherwise support these far more sustainable grass-based and grass-finished systems. We urge the Roundtable to provide much greater attention to the support and development of well-managed grass-fed beef operations that can deliver grass fed beef to the growing number of consumers who are demanding grassfed meat. Currently 80% of grass-fed beef is imported. ²⁰	Regarding different types of beef production systems (i.e., grain vs. grass finishing) the mission and vision of the USRSB focuses on the environmentally sound, socially responsible and economically viable production of beef in the U.S., regardless of the type of production system. Each type of beef production should be evaluated under the auspices of the six high priority indicators. The USRSB guidance is intended to support and improve all forms of beef production. We have included language in the introduction section of this document to ensure that point is clear.
319	Recommendations that apply to the feedyard phase Ten Recommendations for USRSB 1. Processors, wholesalers and retailers should provide fair pricing mechanisms, concrete purchasing preferences, and price premiums to credibly well-managed operations that provide verifiably more environmental benefits to society.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
320	References: The reference lists don't always match with the referenced material in the text, and/or are very sparse relative to the available scientific literature on the topics. To give stakeholders an overview of the full set of materials (to improve transparency and utility) there is a need for tables of contents and summary figures/tables (within each sector, and overall). Currently, the absence of any numbering or outline of sections/subsections makes the materials difficult to navigate, and it is challenging to get a handle on what topics are addressed (and to what degree). Some ideas include: - Develop a table that synthesizes the high priority indicators and key metrics identified by each sector to help stakeholders quickly see where they can (and can't) expect to see improvements through this effort. - Develop a table aggregating the different definitions of each indicator to help stakeholders see how different sectors perceive the indicators as relating to their work in different ways. - Compile materials into a single pdf and include a table of contents with page numbers. Although grass-finished beef represents a small portion of the market, the sector includes operators that have very high sustainability standards. Given that this framework is presented as a sustainability framework for the beef industry, it is critical to more explicitly acknowledge and include grass-finishers. Given that grazing management is included in the Cow-Calf sector SAG, perhaps at the very least this SAG could be expanded to include grass-finished beef. Why not include grass-finishing? It is currently left out of the Framework but could fit into this section.	We appreciate the time you've taken to provide these relevant suggestions to improve the quality of the document. We will review the document in its entirety to ensure the references cited and the reference lists match and also identify areas where additional citation is needed for scientific rigor. However, this document is not intended to be a peer reviewed journal article, but guidance only for grass based operations. Therefore, we will ensure there is a clear distinction between references cited and the resources listed that may be of use to those operations. The document can also be improved with your suggestion of adding a table of contents by sector, including figures/table and including a numbering or outline of sections/subsections to ease navigation of the document. Additionally, we agree that a table identifying indicators (including definitions) and metrics by sector would be beneficial. Regarding different types of beef production systems (i.e., grain vs. grass finishing) the mission and vision of the USRSB focuses on the environmentally sound, socially responsible and economically viable production of beef in the U.S., regardless of the type of production system. Each type of beef production should be evaluated under the auspices of the six high priority indicators. The USRSB guidance is intended to support and improve all forms of beef production. We have included language in the introduction section of this document to ensure that

321	Regarding the sentence on enteric fermentation: yes, feeding higher energy/higher carbohydrate diets can reduce enteric methane production. However, it can also lead to increased emissions from several other sectors (namely feed production and manure management) as well as lead to adverse animal welfare outcomes. Enteric fermentation is an evolved process within ruminants, of which methane is a byproduct. However, it allows the to digest non-human edible feeds (roughage). There is a trade-off here that should be explored in the GHG section of this part of the framework because it is an important consideration.	In our USRSB metrics, we are encouraging each sector to explore options that are most appropriate for them to make improvements in their individual operations. We also recognize the importance of the Life Cycle Assessment to be periodically updated to evaluate the collective change in GHG emissions across the supply chain. The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
322	Resources for implementation should include technologies such as anaerobic digestion for CAFO's that can help improve water quality, improve soil health, and improve water recycling and conservation efforts.	This technology has been evaluated and researched over the years as an option for confined beef cattle feedlots. Since manure at a feedlot is managed as solid manure and not wet manure, to implement anaerobic digestion would require the addition of significant volumes of water and the construction of anaerobic treatment lagoons. To subsequently utilize the by-products of anaerobic digestion, the liquid manure would have to land applied in close proximity to the feedlot or fossil fuels would need to be used to dry the manure back down in order to load the manure and haul it to fields on spreader trucks for land
323	Resources that are assessed should also include water availability and dispersion over the landscape	Agreed, and GMPs are intended to address availability of water, both for ecological benefits and for livestock production.
324	Resources: The quality of the resource lists varies greatly, which is surprising given that a stated goal of this effort was to share these resources. In many cases these sections are limited to very short and general bulleted lists. Providing more specific resources as well as links and/or complete references in all cases would be much more helpful.	Based on your comment, we have increased the quality of the resources provided. As the Framework will continue to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.
325	Retail and Foodservice - The questions/metrics should have a consistent numbering system for ease of reference. - We identified some opportunities for question simplification for the retail sector (e.g. 3.1 & 3.3) - Responding to the metrics helped us recognize the importance of explicitly and publicly supporting industry efforts to advance elements of the beef sustainability framework (e.g. BQA). - There is still a lot of opportunity for improvement for us, and we are committed to addressing key gaps. Even if we answered "yes" to all of the questions, we would still need to then deliver on the commitments (e.g. AHW policies, GHG reductions, etc.). To this point, we recommend questions require additional detail beyond 'Yes or No' answers and request a response to areas in need of further development.	We appreciate your suggestion to adopt a stronger numbering system for the Levels for ease of review and reporting. We will adopt your recommendation and implement into the next iteration of the Sustainability Framework. Our sector established a tiered approach to the metrics that allows for continuous improvement. We have written the metrics to allow operators of all sizes to participate to the degree of their business interests. The USRSB is a voluntary commitment and each business has the right and responsibility to decide what level of continuous improvement they want to achieve for their business objectives.
326	Serious impacts require serious Action: Why Cow-Calf Phase Materials Fall Short The USRSB framework's indicators, metrics, and SAGs are vague, weak, and inadequate for reducing and minimizing impacts and enabling vitally needed progress. The USRSB's metrics fail to scientifically or effectively evaluate progress in reducing key impacts of beef production, including: surface, groundwater and air pollution; the climate crisis; the rise and spread of antibiotic resistant bacteria; and harm to fish, wildlife and biodiversity. Most of the USRSB's indicators and metrics do not focus specifically on reducing impacts. Instead, the metrics tend to be practice-based rather than results-based (mostly verifying the mere development of a grazing or nutrient management plan "or equivalent," not focused on its outcomes or even its implementation details). In that sense, the metrics fail to serve as credible indicators of whether plans were effectively implemented and generate genuine improvements for America's lands, air, water, and communities. Their vagueness—coupled with the lack of meaningful performance measures—raise major doubts that the USRSB's sustainability framework will produce significant improvements to livestock management.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. The metrics were designed to achieve maximum progress across all the indicators in the sector. As a voluntary effort, some guiding criteria in developing the metrics were that producers understand them, know how to begin to implement them (and improve on them over time), and that they are economically and technologically feasible. The practice-based metrics selected are scientifically proven to be able to positively impact sustainability outcomes, while having the best chance of being widely accepted (and implemented) on the ground. Choosing something more prescriptive may be better in some stakeholders' eyes, but would have minimal if not non-existent impact because they would have very minimal uptake and implementation.
327	Several specific recommendations are provided below. In addition, X sees the opportunity to add emphasis throughout the framework on the co-benefits that many of the framework elements will provide for ecosystem services such as flood control, carbon sequestration, municipal water supplies, and recreation when they are applied at landscape scales (e.g., on significant portions of watersheds).	USRSB acknowledges the importance of recognizing the co-benefits of the framework elements and we have included language that calls this out.
328	Should "impact" be replaced with the term "improve"?	This suggestion was already made in the document that went out for public comment.
329	Should add this statement from the full document: These tools are the result of years of scientific research and practical experience and are continually updated to provide the latest in animal management information and technologies.	USRSB agrees that tools and resources must be continually updated. The suggestion to add the following to the resources section fits with the intentions of USRSB. "These tools are the result of years of scientific research and practical experience and are continually updated to provide the latest in animal management information and technologies."
330	Should an outcome be to improve employing safety?	We added 'improved employee safety' as a desired outcome and success criteria.
331	Should desired outcomes include improving water resources?	Thank you for your comment and taking the time to review the Framework. This should be a desired outcome to the Water Resources Indicator, and we will ensure this is reflected in the next version.
332	Should improved water resource management be a desired outcome?	One of the overarching outcomes for the Water Resource Indicator is "Improved water planning and stewardship in retail and food service operations" which touches on improved water resource management. We included aspects of water resource improvement that we felt were actionable by the retail and food service sector in the desired outcomes including water planning and stewardship, increasing understanding of water quality and scarcity in the retail and food service sector, local strategies to mitigate water risk including water planning and context-based water targets. The sector identified these actions to improve water resources. We welcome other concrete suggestions for improving the desired outcomes.
333	Should include some language about improving the well-being of animals	Language has been added.
334	Should part of the desired outcome be to reduce air and GHGs.	Our Desired Outcome #3 in the Air & GHG Indicator addresses this concern, stating "Increase retail and food service operations working towards goals to reduce GHG emissions informed by science."

335	Should this statement also include profitability?	During the indicator development process, the USRSB agreed to identify a group of six high priority indicators. When reducing the number from 13 to 6 (first round of indicator development reduced the number from 160 to 13), the group agreed unanimously that the indicators Consumer Perception, Transparency and Profitability should be considered crosscutting requirements across multiple indicators and would not be identified as one of the specific high priority indicators. In other words, the USRSB believes that profitability is foundational to all indicators. Additionally, the USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business. For food safety, similarly the group agreed that food safety was foundational for the viability of the beef supply chain, touching every facet of beef production, processing, distribution and consumption. Based on your comment we have included a Framework introductory section explaining the above process the USRSB took to develop the 6 high priority indicators.
336	Should we add improve the health and well-being feedlot cattle?	Thank you for this comment. In the "Description of the Indicator and Metric" for Employee Safety and Well-being, we have included the phrase "...thereby improving animal health and well-being..." as it relates to maintaining a safe workplace and reducing stress on people and animals.
337	Should we include "improve resource use"?	We believe the concept of improving resource use is encompassed in the "operational efficiency" element of the feedyard metric.
338	Soil erosion: According to a Cornell University study ⁷ , one hectare of overgrazed pasture can lose more than 100 tons of soil to erosion per year, more than 16 times that of well-managed pasturelands. The authors estimated that 54 percent of U.S. pastureland is being overgrazed. - Surface and groundwater pollution: Top polluters of rivers and streams assessed by the U.S. EPA ⁸ include "grazing in riparian zone or shoreline zones" (33,045 miles), "livestock (grazing or feeding operations)" (20,720 miles), "animal feeding operations" (18,896 miles) and "rangeland grazing" (18,558 miles). - Inefficient water use depletes reservoirs and groundwater supplies: In California alone, the nearly 1 million acres of irrigated pasture require as much water ⁹ as a city the size of Shanghai. - Impacts on America's plant and wildlife communities: Scientists estimate that poor grazing management contributes to the decline of 22 percent of threatened and endangered species ¹⁰ , nearly as many as logging (12 percent) and mining (11 percent) combined. - Environmental and economic impacts of weed invasions: When poor ranch management causes weed invasions, the weeds not only displace our precious native plants and wildlife, but force ranchers and farmers to spend money to control them (over \$100 million each year in Montana ¹¹ alone) with toxic herbicides that, in turn, can wash into and pollute our waterways. - Land conversion: In the United States, 23.6 million acres of grasslands, wetlands and shrublands were converted to row crops ¹² (particularly corn, much of which ends up as feed for farm animals)—between 2008 and 2011 alone. This and other forms of conversion of natural ecosystems to accommodate beef production ¹³ are destroying our precious grassland heritage and releasing large amounts of carbon from the soil (where it is beneficial) into the atmosphere (where it accelerates climate change). - Vulnerability to drought: These impacts of poor management make our grazinglands more vulnerable ¹⁴ to drought (e.g., by reducing soil water holding capacity). When it is too dry to grow enough grass to feed the cattle, ranchers have to feed them hay (often termed "supplemental feed"). Scientists estimate that climate change could increase supplemental feed costs by up to \$235 million per year ¹⁵ for California's ranching industry alone. These economic impacts will be greatest on overgrazed ranches that suffer from	The current condition of grazing lands in the US varies greatly with geography, management, drought, and other factors. Improving the condition and resilience of all of these lands will help address a broad range of issues, including those listed. The USRSB is seeking to support all producers in the US to improve their grazing management and range condition no matter their starting point, and it anticipates that all of the elements will be addressed in GMPs over time.
339	Some key resources and contacts for who farmers can contact for these types of monitoring would be very helpful.	Based on your comment, we have increased the quality of the resources provided. As the Framework will continue to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.
340	Specific comments: Looking ahead to outreach and communications phases of implementation, X is aware that many producers are averse to the Prescribed Grazing Plans offered by NRCS for a variety of reasons. To avoid unwarranted negative initial responses, the USRSB should carefully craft communications that distinguish its intent for Grazing Management Plans from NRCS Prescribed Grazing Plans. X believes that the merits for distinguishing the intent and meaning are solid, but effective communications will be important to successful adoption and implementation of Grazing Management Plans.	USRSB appreciates your comment about the diversity of US cattle producers and their potential aversion to plans offered by NRCS. It's because of this diversity that the cow/calf sector was not prescriptive in the type of resource producers use to develop Grazing Management Plans. NRCS is one of many sources for obtaining assistance with developing grazing plans that are based on sound science, appropriate content and meet producers' goals. Based on your comment, we have increased the quality of the resources provided. As the Framework will continue to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.
341	Suggest identifying 1 metric to ensure consistency across the framework.	Our sector established a tiered approach to the metrics that allows for continuous improvement. We have written the metrics to allow operators of all sizes to participate to the degree of their business interests.
342	Suggest revising to include only one metric to make consistent across the framework.	Our sector established a tiered approach to the metrics that allows for continuous improvement. We have written the metrics to allow operators of all sizes to participate to the degree of their business interests. The USRSB is a voluntary commitment and each business has the right and responsibility to decide what level of continuous improvement they want to achieve for their business objectives.
343	Suggest revising to include only one metric to make consistent across the framework.	Our sector established a tiered approach to the metrics that allows for continuous improvement. We have written the metrics to allow operators of all sizes to participate to the degree of their business interests. The USRSB is a voluntary commitment and each business has the right and responsibility to decide what level of continuous improvement they want to achieve for their business objectives.
344	support GMP as the metric for air and GHG.	We appreciate your support.

345	support the recognition of BQA as the metric for animal health and well-being.	Thank you for recognizing the role BQA plays in improving animal health and wellbeing.
346	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 USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Additionally, based on your comment, we have increased the quality of the resources provided and improved organization and consistency in formatting for the Framework. As the Framework will continue to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.
347	Sustainability requires producers to modify their practices to reduce negative impacts on the land, animal welfare, worker health and safety, the community, and the health of ecosystems that provide critical natural resources. This means that producers must invest in management improvements. But in today's consolidated marketplace, ranchers have fewer and fewer options to choose the processors that can bring their beef to market— and no guarantee of fair pricing that reflects the investments they make given that there are often only one or two regional buyers in the area that dictate prices. In addition, processors are often at great distances from farms, which increases ranchers' transport costs and cuts into profits—adding to the challenges of sustainable production. We call on the USRSB to invest in solutions to this key structural barrier—including supporting, rather than actively opposing the strengthening of GIPSA rules.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Additionally, regulatory affairs and legislative lobbying is out of scope for the USRSB.
348	Ten Recommendations for USRSB 1. Processors, wholesalers and retailers should provide fair pricing mechanisms, concrete purchasing preferences, and price premiums to credibly well-managed operations that provide verifiably more environmental benefits to society.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
349	Thank you for the opportunity to comment on the USRSB's Sustainability Framework. I appreciate the role this effort could play toward improving the industry. From the perspective of systems analysis and science, I see that substantial improvements to this initial framework are still possible. I am respectfully submitting the following comments: appreciate that the USRSB is providing this opportunity for Public Comment and look forward to seeing how the Framework evolves. However, given that the public comments will not be visible to all, the transparency of the process is limited. I urge the USRSB to consider how they might share (1) the substance of the comments that were received and (2) how they chose to address (or not address) comments. A clearer definition of USRSB's scope, capacity and process could give stakeholders more context and may better communicate where the best opportunities are for improvement. -Introductory text explaining why there are so many inconsistencies between each sector's materials (format, approach, etc.) would help stakeholders better interpret these differences. -There are many things that members of the USRSB could be doing to improve sustainability efforts, but they may not all fit into the scope of USRSB. For example, if it is not within the scope of this group to financially incentivize recommended changes, it would be helpful to be up-front about (and explain) such limitations. Many inconsistencies between sections and sectors made it challenging to rigorously evaluate and offer feedback on the Framework. I recognize that different groups wrote on different components of the system, but it would be helpful and important to move towards greater consistency (and a	The USRSB is making anonymous publicly submitted comments and respective USRSB responses available to the public during the second open commentary period of the updated Framework. We have made some clarifications through the addition of an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Additionally, the Framework has been revised to improve consistency in organization and structure across the different SAGs of the Framework for improved clarity, professionalism and reader understanding.
350	The air and greenhouse gas emissions section does not accurately reflect the breadth of the current science and fails to consider critical emissions and tradeoffs. For example, in the guidance section, Are rations properly formulated to optimize performance, there is a missed opportunity to more comprehensively explain a range of dietary considerations for reducing methane emissions, as well as tradeoffs that can come with dietary shifts (feed production impacts, manure impacts, etc.). Also, in general, manure management seems to be missing. Unless I've missed them, these are critical deficiencies of a framework purporting a systemic perspective.	More content has been included on the effects of dietary considerations for reducing methane emissions.
351	The assessment piece is missing from this section so add as #1. Define the strategy to measure efficiency and yield (ex. pounds/weaned weight) 2. Goal 3. Resource 4. Marketing strategy	On line 292, we have added a first bullet "Define the strategy(s) to measure efficiency and yield."
352	The beef industry's concentrated animal feeding operations, which pack together thousands of animals in tightly confined spaces, also cause severe impacts: - surface and groundwater pollution (by nutrients, pathogens, pesticides, heavy metals, and pharmaceuticals); - aquatic dead zones that deplete fisheries and harm fishing communities; - heat-trapping pollution that worsens the climate crisis; - air pollution, including highly toxic gases such as ammonia and hydrogen sulfide, stomach-turning odor and particulate matter that sickens workers and families and reduces property values in neighboring communities; - inefficient water use and freshwater depletion; - an overreliance on antibiotics to manage health problems created by grain-based diets and unhealthy conditions, fueling the dangerous rise of antibiotic-resistant "superbugs"; - land conversion of native prairie to monoculture feed crop fields, reducing habitat and releasing millions of tons of carbon; - declines in pollinators and predators of pests due to excessive use of toxic pesticides, particularly to genetically-modified feed crops; and - inhumane treatment of animals.	The USRSB has identified six high priority sustainability indicators which are covered extensively in the sustainability framework and address water, land and air resources, as well as animal health and well-being. For each sector of the value chain, we have identified metrics and resources to help individual operations continuously improve over time.
353	The BQA cattle care recommendations state the following: i. Provide adequate food, water and care to protect cattle health and well-being. ii. Provide disease prevention practices to protect herd health. iii. Provide facilities that allow safe and humane movement and/or restraint of livestock. iv. Provide personnel with training to properly handle and care for cattle. However, these aren't all based on any scientific/robust assessment of animal welfare or behavior. Current scientifically acceptable metrics include the 5 freedoms or the 3 Circles model (Animal Health & Functioning, Affective State, Natural Living). Natural living and effective state are not addressed within the current framework proposed here. For USRSB to be able to make claims regarding animal welfare, a more progressive framework (including attention to natural living and affective state) will need to be developed for this indicator. Animal welfare entails much more than adequate feed, water, and medication.	The BQA program has broad industry support and is based on solid animal welfare and husbandry principles. When possible, USRSB prefers to utilize existing, industry driven programs.
354	The Cow/Calf Guide, as well as all guides, contain self assessment tools. X finds this approach logical and provides for a strong baseline of analysis for ongoing improvement. USRSB will assess the rate of adoption on a regular basis to track improvements. How will the USRSB assess the the metrics, etc. to see if they are returning the expected results across all of the sector? Research to establish an expected performance baseline is needed and then evaluation across production units. This aspect needs greater consideration and scientific rigor. X supports the individualized metrics if not mentioned in following comments: We do have objection to the listing of resources for grazing management	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Specifically an expanded discussion of the LCA was included.
355	The cow-calf metrics are very well done. No changes suggested.	We appreciate your support.
356	The desired outcomes don't seem to align with the deforestation metric.	We have reviewed the desired outcomes and believe they do align with our deforestation metrics. The longer PDF document has an additional desired outcome for the Level I metric that was not included in the online version of the framework. We have clarified the desired outcomes.

357	The documents must be amenable as new technologies, procedures, strategies and opportunities are learned.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future, including the USRSB commitment to continual improvement.
358	The extremely diverse nature of this segments requires flexibility in how the work of USRSB is implemented. A one size fits all approach will not work, and the work of USRSB, to date, reflects that.	We appreciate your support.
359	The first suggestion X would like to provide USRSB is on the high-priority indicators. The point is very simple, if an operation cannot be profitable it cannot accomplish any of the metrics listed. It is a threshold question that must be answered by every operation before conservation practices can be implemented or employee salaries can be paid. Our suggestion to USRSB would be to make the "Efficiency & Yield" indicator more clear by calling it "Profitability". The metric under the current "Efficiency & Yield" indicator for both the cow-calf and feedyard sectors are appropriate for the the "Profitability" indicator and appropriate considerations for any operation to continue as a going concern.	During the indicator development process, the USRSB agreed to identify a group of six high priority indicators. When reducing the number from 13 to 6 (first round of indicator development reduced the number from 160 to 13), the group agreed unanimously that the indicators Consumer Perception, Transparency and Profitability should be considered crosscutting requirements across multiple indicators and would not be identified as one of the specific high priority indicators. In other words, the USRSB believes that profitability is foundational to all indicators. Additionally, the USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business. For food safety, similarly the group agreed that food safety was foundational for the viability of the beef supply chain, touching every facet of beef production, processing, distribution and consumption.
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362	The framework contains good general information in the Efficiency and Yield metric section that is relevant for all sections (line 295 SMART Objectives). This type of information would be valuable in a general or overview adaptive management section. Starting at line 511	Suggestion was included; a subset of this information has been included in an introductory section.
363	The general information on Grazing Management Plans (GMPs) needs to be clearly referenced to be, or better associated with, each of the Water, Land, and Air/GHG sections for the cow-calf sector. The current structure is confusing, and it may appear that he material is only associated with Water Resources. It can be provided in a stand-alone section after clearly addressing all three indicators/metrics or restated for each. Despite the redundancy of restating the guidance for each indicator and metric, it would be valuable, because users may focus on only one section and miss the reference to the general guidance. Line 530: X recommends that the phrase should consider be changed to should include or will include or another similar term that clearly indicates an expectation that GMPs will incorporate the key steps in continuous improvement.	USRSB agrees that while having one metric for all three Environmental Indicators is positive, there are challenges associated with ensuring clarity. We have edited the Cow/Calf SAG to improve this section to lessen confusion. We also have edited the language on line 530 to read "should include".
364	The health of local communities is also an indicator of the sustainability of beef operations and should be considered within the framework.	The health of local communities can be correlated to the sustainability of beef operations. That link is there, no doubt. However, there are many other factors that influence this. The indicator development process, and this framework, is a starting point.
365	The metric could also include are trained in and are using and enforcing rules for employee safety and well being.	We have amended the metric: Are all individuals who are involved in the operation trained in stockmanship and safety and implementing these practices on the farm or ranch?
366	The metric seems too open ended, I understand that there are a number of ways to do this, but this open ended seems like easy to say, yep, I do have a strategy so then status quo instead of meeting goal of continuous improvement. A better metric might be improvement in the strategies employed to optimize	The USRSB is a voluntary collaborative effort focused on providing resources to help producers in their decision-making, therefore, there is no incentive to utilize the resources if you have no intention of making changes. The cow-calf sector believes "optimize" means that as resources and opportunities for animal productivity become available there will be a path of continuous improvement over time.
367	The most significant concern I have with this framework is the lack of consistency in the approach on metrics. I would advocate for a consistent approach to continuous improvement that is simplistic and practical. The approach of one metric per indicator is great from an uptake standpoint. In the past, many initiatives have failed because they have been too complex to practically implement. I would suggest not following this model.	We appreciate your suggestion to simplify the metrics to one per indicator for simplicity and uptake. The metrics were written as a starting point to address key sustainability indicators with the intent to keep them broad enough for the diversity of business models within the Retail/Food Service Sector and to encourage adoption. We believe it is a business decision to identify how a company wants to proceed with the metrics and further develop their own sustainability targets.
368	The overview of who this sector is great information to include.	Thank you.
369	The presence of a grazing management plan is a critical first step, but it could be more clearly stated that having a plan is not enough. Measurements that ensure that the plan in indeed leading to the expected improvements are much more important.	Monitoring is included in the discussion around a GMP.

370	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.	We agree there is an opportunity to improve the document, including standardizing the format, citations and resources and we will be addressing this for the next version of the SAG. The audience for each SAG is different, and our intent while writing the Retail/Food Service Sector SAG was to write for the retail audience. As such, each Sector's SAGs may look different due to the diverse audience the SAG is tailored to. At this time our Sector would like to keep the examples listed as examples help other members with adoption by viewing how similar companies adopt a metric. We would appreciate more detailed feedback about potential citations to add, as well as citations that may seem biased. Current resources listed in the SAG do not encompass all potential resources.
371	The section comparing beef production in 1977 to today fails to consider tradeoffs that have occurred in the same timeframe and seems somewhat irrelevant given that the goal of this Framework is to acknowledge the current need and opportunities for improved sustainability. Relatedly, the inclusion of only a single reference in the References for this section seems inadequate, given the rich scientific literature available on greenhouse gas emissions in the beef industry.	We agree with your point and have removed the comparison to 1977.
372	The success of the USRSB is equally attributable to what the roundtable has stated it will do as well as what it will not do. Specifically, we support the roundtable's effort to develop tools and resources for members of the supply to voluntarily utilize as they see fit. We also support the fact that the USRSB will not attempt to become a certifying or auditing organization. Those types of programs must be left in the hands of business-to-business supply chain relationships. The governance and decision-making process established by the roundtable has helped ensure that each segment of the supply chain is responsible for drafting the content, vetting it with representatives within that segment, and making decision on what should be included, excluded or revised based on feedback from other USRSB members or the public. Creating this culture of "ownership" by each segment of the supply chain has helped build confidence and certainty in process.	Thank you for your support.
373	The task taken on by USRSB was daunting given the vast geographic, demographic and land use expectation differences throughout the United States and guiding principles accompanied by realistic metrics for self-assessment and improvement seemed logical in the development process. X appreciates the overall approach for user adaptability in the Sustainability Framework as well as the emphasis on Beef Checkoff funded and enhanced programs such as Beef Quality Assurance. These indicators will serve the Framework positively among stakeholders.	We appreciate your support.
374	The U.S. Beef Industry has a zero tolerance for animal neglect or mistreatment. All employees must understand and practice proper animal handling and care at all times.	This change was already included in the document that was out for public comment.
375	The USRSB explores the challenges and opportunities for continuous improvement across all aspects of the beef value chain but will not mandate standards nor verify individual stakeholder performance. - This is a critical criteria for the USRSB. Setting objectives and not setting processes for advancing performance is appropriate. There should not be any attempt to standardize producer management and moreover no need to do so.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
376	The X also strongly supports the auction markets and feedyard metrics. These metrics recognize the most critical points of environmental sustainability by allowing each operation to craft a strategy that fits within their climate, geography and budget, but encourages them to continue to seek out improvements regardless of where they are today. We also specifically support the recognition by the auction market sector to focus on the indicators where they can have an impact. Some important examples in the metrics that provide feedyards and auctions with the flexibility necessary to implement the framework at feedyards include metrics such as the Beef Quality Assurance Program to address Animal Health and Wellbeing; a Nutrient Management Plan to help manage Land Resources (for feedyards); and employee safety programs and trainings focused on the key elements outlined in the Employee Safety and Well-being indicator.	We appreciate your support.
377	There are many "yes" or "no" questions or questions asking for a specific number (for example water, CO2), 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.	We have made edits throughout the document to add clarity regarding scope. With regard to the yes/no questions, the metrics were written as a starting point to address key sustainability indicators with the intent to keep them broad enough for the diversity of business models within the Packer/Processor Sector and to encourage adoption. Beyond the yes/no answer, we believe it is a business decision to identify how a company wants to proceed with the metrics and further develop their own sustainability targets. We hope that entities will drill down into the specifics and discuss the positive and innovative things they are doing under each indicator within their company and with the public.
378	There seems to be a lacking element of this approach. While the last couple sentences talk about science based simulations and changes in practices, We do not see a strong process delineated for this sort of evaluation/measurement and subsequent adaptive management. USRSB is lacking a framework for strong evaluation and adaptive management to determine if SAG's are performing as expected. Capacity is needed for research, evaluation and adaptive management.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future, to ensure continuous improvement.
379	These are not the metrics as stated in the full document. This list is more of what we want to happen with the metrics.	We have made this correction.
380	These metrics and assessments appear to be of good value for the producer, however as I read these it primarily states voluntary assessment or guidance but it also refers to getting more producers to use these metrics and guidelines, Who is actually going to monitor this program at the farm level. Is this going to become another third party audit to ensure ranches are complying with the program guidelines and if you don't use these guidelines what difference would it make. The greatest challenge will be to convince the part time rancher or farmer or hobby farms that this is a good metric and will help everyone. However if the persons or farmer/rancher is only part time they will not be very willing to participate. What are the rewards for those who participate. How will USRSB know who is actually using the system guidelines. If there is a third party audit who would pay for this audit and who would have access to the information. Clean water, clean air, healthy soils is the goal but convincing part time producer folks may be the ultimate challenge. Overall my biggest concern would be outside parties with different motives dictating what we do and cant do at the ranch or farm. Who will have the ultimate say in how we operate at the ranch.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
381	This aligns very well with the objectives of the program I lead for my organization as well as our regional strategic plan. Could strengthen this with the addition of examples. Conversion of land to subdivisions, etc. and that keeping cow-calf operations sustainable results in land that is available for cattle and wildlife as well as maintaining the cultural this is a critical indicator for all segments. its important that profitability remain part of all USRSB work. without it, there will be no progress on other key indicators.	The resources section has been improved to provide more region-specific resources.
382		During the indicator development process, the USRSB agreed to identify a group of six high priority indicators. When reducing the number from 13 to 6 (first round of indicator development reduced the number from 160 to 13), the group agreed unanimously that the indicators Consumer Perception, Transparency and Profitability should be considered crosscutting requirements across multiple indicators and would not be identified as one of the specific high priority indicators. In other words, the USRSB believes that profitability is foundational to all indicators. Additionally, the USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business.
383	This is a good addition - having the high priority indicators and glossary of terms sections in the report. Very helpful.	Thank you for your comment.
384	This is a good paragraph	We appreciate your support.
385	This is another key element that is not well understood, perhaps adding to the language to make more clear and add additional details would help.	More content has been included on the effects of dietary considerations for reducing methane emissions.

386	this is invisible	We are unsure what you intended with this comment. Please respond during the second comment period with additional clarity and we will address your comment more completely.
387	This is really challenging and in the U.S. there is no way to do this cost effectively. It seems like this is not a practical approach to make a meaningful difference. Is there something that could be identified that is more practical?	We appreciate your feedback recognizing the Retail/Food Service Sector seldom have direct influence on significant land impacts through our operations. The Retail/Food Service Sector includes U.S. based companies that have domestic and international beef supply chains. Recognizing that retail and food service providers seldom have direct influence on significant land resource impacts through their operations, the Retail/Food Service Sector's Land Resources metrics and sustainability assessment guide focuses on a company's ability to influence in its supply chain. Deforestation has been identified as a risk associated with land use change due to beef production in many international markets. Since many US retailers and food service providers have international supply chains, it is important that the retail metric address this detrimental issue. Furthermore, this is an issue shareholders are asking publicly traded companies to address in their beef supply chains. We are proposing adding a Level II Metric that supports grazing management plans to maintain and reduce grassland conversion.
388	This key element was specifically difficult for our pilot project members to answer in the upper mid-west.	We appreciate your efforts to evaluate the draft metrics in a real-world application through your pilot project. The feedyard metric for Air & GHG was reviewed by the feedyard sector members and revised to provide greater clarity in the metric question itself and in the sustainability assessment guide. Specifically, we called-out that not all of the air emissions of concern and associated management practices are applicable to all geographic regions of the U.S. where feedyards are located.
389	This might be the way BQA refers to "low stress" but it might sound better to say "Cattle with the lowest level of stress" or "Less stressed cattle"--meaning less stress or "fewer stressed cattle"--meaning fewer cattle with stress.	We have made this clarification.
390	This seems like a lot to expect a smaller retail partner to accomplish.	Our sector established a tiered approach to the metrics that allows for continuous improvement. We have written the metrics to allow operators of all sizes to participate to the degree of their business interests. The USRSB is a voluntary commitment and each business has the right and responsibility to decide what level of continuous improvement they want to achieve for their business objectives.
391	this segment is again very diverse. while much of the cattle feeding industry is located in the plains, there is cattle feeding in all parts of the country. those operations also vary greatly in size. So, indicators and metrics must fit for all. The work of USRSB recognizes that.	We appreciate your support.
392	This suggests ranchers should avoid using medically important antibiotics. Avoiding the use of a stronger antibiotic could cause further herd infection and require the use of more antibiotics. This should statement should be revisited.	This recommendation should be taken in the broader context of the 14 recommendations, which also discusses interventions to prevent more animals from being sick. The USRSB believes the flexibility given to the producer and their veterinarian is appropriate to determine the best course of action.
393	This would be a good place to indicate that due to variations across sectors and places, that method for evaluating indicators met will be tested in pilot study areas and shared with similar places.	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.
394	Through our pilot project, our feeder partners did not understand this key element "develop strategies to meet water needs in the future" I think we may want to add additional clarification.	We appreciate your efforts to evaluate the draft metrics in a real-world application through your pilot project. We have revised the language in this section to expand on what is meant by "develop strategies," especially in light of the fact that there are a variety of factors that impact water needs assessment from one region to another.
395	To increase the effectiveness of the Framework X would encourage USRSB to further develop the resource sections. Each state has specific resources applicable to their geography and climate, and producers should be provided with the most relevant resources available. We understand this is a starting point and would be happy to help contribute to this development in the future.	Based on your comment, we have increased the quality of the resources provided where we felt additional national/regional resources were available and widely accepted. As the Framework continues to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.
396	To increase the effectiveness of the Framework X would encourage USRSB to further develop the resource sections. Each state has specific resources applicable to their geography and climate, and producers should be provided with the most relevant resources available. We understand this is a starting point and would be happy to help contribute to this development in the future.	Based on your comment, we have increased the quality of the resources provided where we felt additional national/regional resources were available and widely accepted. As the Framework continues to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.
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398	To increase the effectiveness of the Framework, X encourages USRSB to further develop the resource sections. Each state has specific resources applicable to their geography and climate, and producers should be provided with the most relevant resources available. We understand this is a starting point and would be happy to help contribute to this development in the future.	Based on your comment, we have increased the quality of the resources provided where we felt additional national/regional resources were available and widely accepted. As the Framework continues to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.

399	<p>To really assess sustainability in the real world, the opening indicator would be profitability! Without that dirty word, none of us would be in a position to discuss any aspect of being sustainable. We must all realize a profit is necessary to continue whatever business allowed us to participate in this process. So realize the health and well being of owners and managers of these operations is key to the future of the round table. What about the welfare of Ranchers and Farmers? The data shows suicide rates are at an all time high. That doesn't sound sustainable to me! Just look at the average age of these people and you will realize replacing them is not easy. One large company decided it would not sell as large a quantity of Holstein beef as it had been doing in the past. That will redirect those producers to eliminate new born Holstein bull calves that may have no place in the beef chain thanks to the change in policy of that company. How is this utilizing the current resources for sustainability? This is not an environmentally sound or socially responsible policy. Depending on foreign-made or obtained items such as minerals, medicines, and vaccines manufactured out of our country does not make our industry safer or sustainable. A recent mineral shortage was created due to an overseas plant breakdown. This outcome is not desirable for making high quality feed. Maybe we need to assess and study the many items that put us at risk. Something as simple as a trade war could put us at risk for numerous items used in all our industries. What then?! Sustainability seems to be an ever changing vision. If you're ranching and it doesn't rain for a year, your idea of "sustainable" takes on a whole new definition of just surviving and staying in business. These struggles are going on everyday and most people are unaware of the battle producers engage in daily, so be careful of what you pour on them in addition to the daily grind. The continuing improvement throughout the cattle industry is a realistic demonstration of how hard producers are working to accomplish the goals set forth by the round table even before the round table was even in existence. This should be kept in mind as we attempt to micro-manage production agriculture. Our industry has a way of eliminating non-efficient operators. They go broke. That's the way the real world works, similar to nature, only the fit survive.</p>	<p>First of all, thank you for your passion and commitment to raising cattle and producing high quality protein for the U.S. and world.</p> <p>During the indicator development process, the USRSB agreed to identify a group of six high priority indicators. When reducing the number from 13 to 6 (first round of indicator development reduced the number from 160 to 13), the group agreed unanimously that the indicators Consumer Perception, Transparency and Profitability should be considered crosscutting requirements across multiple indicators and would not be identified as one of the specific high priority indicators. In other words, the USRSB believes that profitability is foundational to all indicators. Additionally, the USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business. For food safety, similarly the group agreed that food safety was foundational for the viability of the beef supply chain, touching every facet of beef production, processing, distribution and consumption. Based on your comment we have included a Framework introductory section explaining the above process the USRSB took to develop the 6 high priority indicators.</p> <p>We also recognize the two examples that you highlighted, regarding sustainable practices:</p> <ol style="list-style-type: none"> 1. Holstein cattle are an important part of the beef supply chain. 2. Dependency on foreign suppliers and disruptions in those supply chains can have significant and
400	typo? "Publicly"....should it be "available publicly?"	Changed as suggested.
401	U.S. beef.... what a joke anymore... a foreign country can ship beef to the U.S. and have it packaged in the U.S. and it is marked U.S. beef.....COOL needs to be put back in place to protect our U.S. beef, and for the person that does not want that to happen is not a U.S. proud person...	The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition of an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Additionally, regulatory affairs and legislative lobbying in/out of scope of the USRSB.
402	<p>Unfortunately a significant portion of the land that livestock (mostly beef cattle) graze (nearly 800 million acres of American lands—an area six times the size of Texas) is poorly managed. By purchasing beef produced on verifiably well-managed ranches and farms institutional and consumer beef buyers can avoid contributing to the environmental costs of this poor management, including:</p> <p>Climate change: A 2016 meta-analysis⁶ that reviewed over 1600 studies found that beef production generates more than 4 times (26.5 lbs of CO₂e/lb) the climate emission of pork (5.8 lbs CO₂e/lb) and more than 7 times the impact of chicken (3.6 lbs of CO₂ eq/lb). While impact depends on quality of management, these are average life cycle GHG emission numbers across many regions including the processing phases of production.</p> <p>1 https://www.fs.fed.us/grasslands/ecoservices/ 2 Gelbard, J. L. (2018). "What's Really 'Green'? A Look at Beef Grazing Operations." Triple Pundit. https://www.triplepundit.com/2018/01/sustainable-beef-grazing-operations/ 3 https://www.sciencedirect.com/science/article/pii/S0377840111001660 4 https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1043496.pdf 5 Ibid. 6 http://www.research.lancs.ac.uk/portal/en/publications/systematic-review-of-greenhouse-gas-emissions-for-different-fresh-food-categories(153c618e-1b41-4cf4-b23e-7bc635cd2541)/export.html</p>	USRSB recognizes that GHGs from beef production present a significant environmental concern that needs to be managed and reduced via the GMPs. These recommendations also recognize that a major portion of North America's grazing lands require grazing for full ecological function and/or are incapable of providing human food without the influence of ruminant grazers. The charge of the USRSB is to support continuous improvement on all grazing lands in the US.
403	<p>Use of Antibiotics and Animal Health and Welfare: We are especially concerned with the USRSB's materials regarding antimicrobial use. The framework does not acknowledge the need to reduce antibiotic use and to eliminate routine uses of medically important antibiotics for growth promotion and disease prevention purposes. Thus, the USRSB's "sustainability framework" will worsen, not help solve, the beef industry's overuse of antibiotics, which threatens the viability of critical human medicines. The spread of antibiotic resistance, which is directly tied to antibiotic use both in human medicine and animal agriculture, is an urgent public health crisis that threatens to reverse the public health gains of the last century. While the USRSB document includes fourteen recommendations on antimicrobial stewardship as the indicator for animal health and welfare that would be good to implement, they do not go far enough. We are particularly disappointed that USRSB merely "discourages" subtherapeutic antibiotics uses and includes "disease prevention" as an accepted use of antibiotics.</p> <p>In addition, the proposed metrics for animal health and welfare do not specifically refer back to the indicator and instead focus on a variety of animal health related activities in the Beef Quality Assurance Program including a few related to antimicrobial stewardship. These metrics should clearly refer back to the fourteen recommendations in the indicator and include some measure of whether or not they are being followed and being effective in reducing inappropriate antibiotic use. Any attempt to address the sustainability of antibiotic use must include tracking antibiotic use per animal produced and include specific indicators related to reduction of antibiotic use and numbers and/or</p>	<p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p> <p>While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level is most appropriate for them.</p>
404	Very SMART! (Specific, Measurable, Achievable....)	We appreciate your support.
405	<p>Water Resources - Inadequate consideration of simply conserving or limiting water exists in this component. Return flows when irrigating yield great returns to the environment and downstream water users. Actual consumptive uses need to become the baseline. For further consideration please reference the following documents. While derived in Colorado, the mechanisms apply broadly. https://docs.wixstatic.com/ugd/302b62_c1c172d1059447bda7dfa1a08aa11f88.pdf https://docs.wixstatic.com/ugd/302b62_a42489ba652d4385b706692a46117769.pdf</p>	USRSB agrees that water quantity impacts need to be addressed; grazing activities that affect water quantity (and quality) are to be addressed within the GMPs. USRSB appreciates the resources suggested and will be pleased to consider adding others recommended through this process.

406	<p>Water resources: for this and all other feedyard sector indicators, the language is the same as for cow-calf sector indicators. The metric is “Are water resource management strategies implemented at the feedyard that address water management, water use optimization, and conservation, and water quality?”</p> <p>a. This metric fails to verify whether feedyards are in fact generating favorable results such as good and improved water quality and water use efficiency. Simply requiring producers to “address” water conservation and water quality does not indicate sustainability. “Address” should be changed to an action verb that explicitly indicates good and/or improving (e.g., “protect and improve”).</p> <p>b. There are some good assessment questions included in the guidance. Much of it relies on Clean Water Act-related protections. These protections are not enough to verify “sustainable” management because enforcement resources vary considerably by state. Even for permitted feedlots, examples of polluting discharges and fish kills are numerous, especially in states where enforcement agencies are severely understaffed.</p> <p>c. Given the increasing frequency of severe (e.g., 100+ year) rain events in our changing climate, building facilities to withstand 25 –year storm events is no longer adequate to prevent discharges. We urge USRSB members to review current and predicted rainfall trends and update this recommendation (e.g. to 100+ years) to reflect local to regional increases in the frequency of severe rain events.</p> <p>d. USRSB relies on Field to Market indicators for measuring the water impacts of feed production. Feed production for beef in many areas of the U.S. is responsible for rapid depletion of groundwater supplies, major nutrient and pesticide pollution, declines in pollinators from bees to monarch butterflies; and land conversion, among other things. The framework does not specify which Field to Market indicators USRSB will use or how USRSB will work with Field to Market to incentivize and enable more sustainable feed production. Simply stating that it is a different type of operation and relying on Field to Market to measure progress is inadequate for credibly detailing how USRSB will curtail related impacts of beef production. This omission constitutes a major loophole for the USRSB framework. First, there is no definition of what “sustainably produced” feed actually means. In addition, if it is relying on the Global Roundtable on Sustainable Beef’s definition, which requires use of sustainably produced feed only “where available,” this means that beef producers can carry on sourcing whatever feed they like simply by claiming that sustainable feeds are not available.</p>	<p>The USRSB feedyard sector chose the metric and clarifying questions because they have the greatest chance of a high adoption rate and improving the indicator.</p> <p>The USRSB and Field to Market have entered into a collaboration agreement to explore how the two sustainability initiatives can jointly work together to address feed sustainability. This collaboration is still in its infancy. We recognize the importance of addressing feed sustainability and look forward to making progress in this space through our collaboration with Field-to-Market.</p>
407	<p>Water Resources: In the majority of states the wildlife is owned by the state/public and policy is out of the control of the private manager/producer. To expect the private producer to take on the financial burden of wildlife inventory and management without assurance of financial incentives is a flawed proposition, given the overall involvement this metric asks of the producer to achieve sustainability. Without clear outline of a financial incentive: recommend deletion of the wildlife section. Land Resources: Rewrite: Line 747: Soil Erosion; Line 748: Nutrient Loss; Line 749: Soil Health and Ecological Function; Line 750: Wildlife Habitat; Line 751: Invasive Species Management; Line 752: Riparian Areas; Line 753: Livestock and Wildlife (animal) Carrying Capacity, Air & GHG: Rewrite: Line: 838: Plant Vigor and Density; 839: Erosion and Therefore Particulate Emission; Line 840: Carbon Sequestration; Line 841: Nutrient Cycling/Soil Health. Employee Safety: Rewrite: Line 937: Prevent or Control the Hazards and Risks; Line 953: Prevent or Control the Hazards and Risks; Line 985: Rewrite or delete entirely</p>	<p>Unfortunately, the USRSB is confused by your comment regarding owned wildlife as this may vary significantly from place to place. We also believe wildlife and biodiversity is an important piece of sustainability. Additionally, the edits you suggest significantly alter the impacts of a comprehensive and implemented GMP.</p>
408	<p>Water resources: The indicator is, “The volume of water used by a sector for each process, and any impacts on water quality by a sector for each process.” The metric for measuring the indicator is: “A grazing management plan (or equivalent) being implemented that maintains or improves water resources.”</p> <p>a. This indicator fails to (e.g., gallons of water applied per lb. of beef produced) or water quality (e.g., miles of U.S. waterways impaired by livestock grazing and/or animal feeding operations). Thus, it will not meaningfully illustrate movement toward sustainability. Most USRSB metrics suffer from this same problem. This metric fails to serve concretely measure progress on improving water use efficiency (e.g., gallons of water applied/lb. of beef produced) or water quality (e.g., miles of U.S. waterways impaired by livestock grazing and/or animal feeding operations). Thus it will not concretely measure progress on improving water use efficiency or illustrate movement toward sustainability at either the level of individual operator or the industry as a whole. Most of these USRSB metrics suffer from this same problem. The section also omits guidance regarding irrigation scheduling and efficiency for irrigated pastures, which more often than not needs to be dramatically improved.</p> <p>b. The guidance to achieve better water resources management contains some good materials on the multiple benefits of related BMPs – even including contingency planning and wildlife resource inventory and management (However, wildlife-related items would seem to belong under Land Resources, and contingency planning is often categorized with climate-change related requirements as “adaptation” to our changing climate).</p>	<p>USRSB recognizes a step-wise approach to progress. We also firmly believe that a GMP will lead to the outcomes you recommend. The USRSB specifically designed our framework to improve rangeland management practices and rangeland condition on multiple environmental metrics including wildlife habitat (including rare and sensitive species), water quality and quantity, GHG emissions, agriculture conversion, and others. By increasing the number of operations with comprehensive, well designed GMP, the USRSB is confident that the ultimate outcome will be improved metrics around wildlife, water quality and quantity, GHG emissions and as well as other important metrics for working lands. But the GMP is the first step and cannot be overlooked as the starting point toward improving the outcomes you mention. An expanded discussion of the LCA was included in the introductory section.</p>
409	<p>Water Resources: 7. The 5th question should be revised to specify reporting since measurement is a) implied in reporting and b) included in the assessment in questions #1. Revision could be: “Is the company participating in a credible system for reporting water stewardship?”</p>	<p>Thank you for your comment and suggested edit for the water Level III water resources metrics. We agree with your recommendation to update the first metric in Level III to say “Is the company participating in a credible system for reporting water stewardship?”</p>
410	<p>We are also supportive of your description of continuous improvement and feel strongly that the cattle industry will continue to improve as we have always done. It is our hope the USRSB and our supply chain partners recognize the great foundation which has already been built and will help the producer-end of the supply-chain build upon that foundation.</p>	<p>Thank you for your support. The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p>
411	<p>We are also supportive of your description of continuous improvement and feel strongly that the cattle industry will continue to improve as we have always done. It is our hope the USRSB and our supply chain partners recognize the great foundation which has already been built and will help the producer-end of the supply-chain build upon that foundation.</p>	<p>Thank you for your support. The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p>
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413	<p>We are especially concerned with the USRSB’s materials regarding antimicrobial use. The spread of antibiotic resistance, which is directly tied to antibiotic use both in human medicine and animal agriculture, is an urgent public health crisis that threatens to reverse the public health gains of the last century. While the USRSB document includes fourteen recommendations on antimicrobial stewardship as the indicator for animal health and welfare that would be good to implement, they do not go far enough. We are particularly disappointed that USRSB merely “discourages” subtherapeutic antibiotics and includes “disease prevention” as an accepted use of antibiotics. The framework does not acknowledge the need to reduce antibiotic use and to eliminate routine uses of medically important antibiotics for growth promotion and disease prevention purposes. Thus, the USRSB’s “sustainability framework” will worsen, not help solve, the beef industry’s overuse of antibiotics, which threatens the viability of critical human medicines. In addition, the proposed metrics for animal health and welfare do not specifically refer back to the indicator and instead focus on a variety of animal health related activities in the Beef Quality Assurance Program including a few related to antimicrobial stewardship. These metrics should clearly refer back to the fourteen recommendations in the indicator and include some measure of whether or not they are being followed and being effective in reducing inappropriate antibiotic use. Any attempt to address the sustainability of antibiotic use must include tracking antibiotic use per animal produced and include specific indicators related to numbers and/or percent of animals treated. Most feedlots feed the first-line medically important antibiotic, tylosin, to all cattle for the entire feeding period to reduce liver abscesses that result from inappropriate high-energy diets. This practice contradicts multiple recommendations in the list, so there should be metrics that measure how this and other practices inconsistent with the indicator are curtailed and eventually eliminated.</p>	<p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p> <p>While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level is most appropriate for them.</p>

414	<p>We have a two part operation. We buy young open heifers of good blood lines, some registered and breed to a top quality bull, then sell the bred heifers in the last trimester. We also buy heavy feeders (650 to 900 pounds) and finish them on grass and forage for a local direct to the consumer freezer beef trade. Both of these programs offer better returns for a small farm than the traditional cow/calf or backgrounding program. Three ways that I see for increasing the sustainability of beef production in the United States. 1. Shift from continuous grazing to Management Intensive Grazing. I have doubled the carrying capacity of my small farm by not making hay on the farm and using 1-2 day paddock grazing. Good quality hay is relatively cheap here and brings nutrients to the farm. 2. Increase utilization of crop residue. If row crop farmers that do not have cattle would allow a cattle producer to put temporary fence around the harvested corn field, 2-3 months of feed would be available for the cost of fencing. Running the fodder and spilled grain through the cow would improve nutrient cycling and increase biological diversity in the field. Given the low price of wheat, it might be more beneficial to plant rye and graze the cattle all winter, removing them in time to plant an earlier crop of Soybeans. Full season beans almost always yield better than double crop and give an opportunity to harvest earlier and getting some cows back on the land. 3. Increase the use of silvo-pasture. Prior to the 20th century, fields were fenced and the cattle ran loose on the land. Cattle could be very efficient at reducing hardwood competition on our thousands of acre of pine plantation in the Southeast. These three things could allow cattle numbers to be increased in the South where the harsh cold of the mid-west is not generally a problem. We could deal with the heat by shifting away from black hide cattle, which is a whole other question.</p>	<p>We appreciate you sharing your sustainability story.</p>
415	<p>We learned during our pilot project that not all of these "key elements" are applicable in all regions of the U.S. We should review these through that lens, or adjust language to be more flexible depending on region.</p>	<p>We appreciate your efforts to evaluate the draft metrics in a real-world application through your pilot project. The feedyard metric for Air & GHG was reviewed by the feedyard sector members and revised to provide greater clarity in the metric question itself and in the sustainability assessment guide. Specifically, we called-out that not all of the air emissions of concern and associated management practices are applicable to all geographic regions of the U.S. where feedyards are located.</p>
416	<p>We strongly encourage the USRSB to go back to the drawing board and develop a new framework and plan of action—including the need for regulatory change—that generates far more environmental, economic, health and other benefits for stakeholders up and down the supply chain. We also recommend, at least for the time being, that the USRSB remove the term "sustainable" from its name and choose a more accurate term that does not undermine the value of credibly sustainable and regenerative beef production systems.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p>
417	<p>We strongly request that the Conservation NGO's be put under a general tab of "conservation NGO's" or be removed completely. Also removal of HMI, Savory etc we removed and use general nomenclature.</p>	<p>Based on your comment, we have increased the quality of the resources provided. As the Framework will continue to evolve over time, we would be happy to evaluate resources you feel would be helpful to supply chain members seeking to improve their beef sustainability footprint.</p>
418	<p>We suggest USRSB provide more fluidity throughout the different sectors of the Framework by having each sector start with only one metric per indicator. This would increase the flow and fluidity of the entire Framework. In anticipation that other commenters may suggest the reverse, X would respond that the success of the USRSB in its mission will depend on uptake of a voluntary system, and the greatest hope for significant uptake is to start at the single metric per indicator approach. If it is necessary to have additional metrics in a sector due to different types of entities, a grocery store versus fast food restaurant for example, then there needs to be an additional supply chain category created that has one metric per indicator.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Each supply-chain sector was responsible for determining the best approach to metrics for their sector. That determination led to different approaches taken by different sectors. Each of the sectors has explained their rationale for this decision. The Framework has also been revised to improve, to a certain extent, consistency in formatting and organization.</p>
419	<p>We suggest USRSB provide more fluidity throughout the different sectors of the Framework by having each sector start with only one metric per indicator. This would increase the flow and fluidity of the entire Framework. In anticipation that other commenters may suggest the reverse, X would respond that the success of the USRSB in its mission will depend on uptake of a voluntary system, and the greatest hope for significant uptake is to start at the single metric per indicator approach. If it is necessary to have additional metrics in a sector due to distinct types of entities, a grocery store versus fast food restaurant for example, then there needs to be an additional supply chain category created that has one metric per indicator.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Each supply-chain sector was responsible for determining the best approach to metrics for their sector. That determination led to different approaches taken by different sectors. Each sector has provided a rationale for their determination.</p>
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421	<p>Well-managed grazinglands provide valuable food and ecosystem services to society¹, including²:</p> <ul style="list-style-type: none"> ¹- Reducing carbon pollution by storing it in soil: Scientists have found that land converted from crops to well-managed grazed grassland³ absorbed enough carbon in its soil to offset all other emissions from the beef produced on that land. - Filtering rainfall runoff to maintain and restore water quality: Healthy vegetation on well-managed grazing lands cleanses runoff by trapping sediment before it can reach waterways, while erosion and runoff on poorly managed pasture pollutes surface waters. - Enhancing recharge of ground and surface waters: Healthy grasses enable ranchers to get more out of every raindrop⁴ by slowing runoff, so that more rainwater is absorbed into the soil instead of flowing off the pasture and into waterways. Healthy soils absorb water like a sponge, keeping more in the system to support productive grasses and livestock—and native plants and wildlife. This reduces ranch and farm vulnerability to droughts and floods. - Conserving our national heritage and protecting biodiversity: Well-managed ranches provide good wildlife habitat and brilliant displays of native wildflowers. - Providing recreational opportunities: Livestock management practices that reduce erosion and improve water quality help make lakes and rivers cleaner for swimming, fishing, and boating. - Providing forage for livestock: ruminant livestock convert plants that humans cannot eat into nutritious food. 	<p>USRSB acknowledges the importance of recognizing the co-benefits of the framework elements and we have included language that calls this out.</p>
422	<p>What do they get for adopting the SAGs - i.e. what is the incentive? Can they market their product differently? And how is it measured that they met the SAG's? If this is not addressed by the USRSB is this something that will be worked on later as the next step for the USRSB?</p>	<p>During the indicator development process, the USRSB agreed to identify a group of six high priority indicators. When reducing the number from 13 to 6 (first round of indicator development reduced the number from 160 to 13), the group agreed unanimously that the indicators Consumer Perception, Transparency and Profitability should be considered crosscutting requirements across multiple indicators and would not be identified as one of the specific high priority indicators. In other words, the USRSB believes that profitability is foundational to all indicators. Additionally, the USRSB is a multi-stakeholder group that includes direct competitors. As such, there are legal and ethical concerns regarding discussions around pricing and profit and therefore they cannot be included. Each business entity should address profitability independently within the context of their business.</p>

423	<p>Where do I start!...first of all using conclusion with the top Commodity Company to force your agenda is not only illegal but puts our FREE Markets in jeopardy.....as a Cow And calf producer we have always been sustainable it's corporate America that has lost the trust of the consumer with putting profit before sustainable!.... I believe everyone has it's different agenda when it comes to sustainable beef...rather it's an environmental group trying to eliminate animal protein, or a major Beef Packer trying to vertically integrate the beef industry.....but when you start talking about 3rd party Haitian verification and the unknown of continuous improvement "which is unattainable"....as a land and cattle owner these only touch my Freedom and liberty's in jeopardy let alone my private property rights!.... Look if McDonald's wants to truly be sustainably put a premium on it and we will produce it until they have more skin in the GAME NO Thank you (cheap way for them to get better beef cheaper)but it's hard to see that my Cow's grazing is causing more harm than the drive thru window all day at any McDonald's.. You have left out one sector of the Beef Industry which to me I where the "BAD reputation " comes from.....If you can't CONTROL the Stocker/backgrounderthen there is no reason to bother the calf producer.....if you are truly trying to be sustainable industry.....or just controlling of one. I have more concerns that would need to be answered before I could even agree to follow this program</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Currently, more than fifty percent (50%) of the USRSB membership are producer or producer associations. To date, cattle producers have been very supportive of the effort and are looking at the USRSB Framework as a resource for producers who are looking for continuing opportunities on how to improve their operations overall. It is and will remain a voluntary effort to help improve the sustainability of U.S. beef production.</p>
424	<p>While a tiered approach to metrics works for some segments, it does not work for the producer segments. More progress can be made through education, outreach and self assessment opportunities as currently outlined. A tiered approach for this segment will have a negative affect on uptake of USRSB work.</p>	<p>Based on your comment, we have made some clarifications through the addition of an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Each supply-chain sector was responsible for determining the best approach to metrics for their sector. That determination led to different approaches taken by different sectors. Each sector has provided a rationale for their determination.</p>
425	<p>While we urge the industry to greatly expand sourcing and production of grassfed beef produced on verifiably well-managed ranches (as certified by a comprehensive independent third-party labeling program), better-managed feedlots – including feed production – can reduce many of the above impacts Looking at the big picture, reintegrating crop and livestock operations62 – precisely fertilizing crops with animal waste and feeding animals crop wastes – is drawing renewed interest63 for its important benefits. These include reduced fertilizer and manure disposal costs, and protection against pollution-related risks. Below, we provide selected examples of how USRSB's feedyard sector materials fall short of addressing the above impacts, and incentivizing and enabling the above positive outcomes:</p>	<p>Regarding different types of beef production systems (i.e., grain vs. grass finishing) the mission and vision of the USRSB focuses on the environmentally sound, socially responsible and economically viable production of beef in the U.S., regardless of the type of production system. Each type of beef production should be evaluated under the auspices of the six high priority indicators. The USRSB guidance is intended to support and improve all forms of beef production. We have included language in the introduction section of this document to ensure that point is clear.</p>
426	<p>Why Feedyard Phase Materials Fall Short The USRSB's feedyard phase materials fall short of incentivizing the benefits of good management and minimizing the devastating environmental, public health, animal welfare, and community impacts of poor management. Similar to the issues outlined in the cow-calf section, the USRSB framework's indicators, metrics, and SAGs are vague, weak, and inadequate for reducing and minimizing impacts and enabling vitally needed progress. The USRSB's metrics fail to effectively and scientifically evaluate progress in reducing key impacts of beef production, including: surface, groundwater and air pollution; the climate crisis; the rise and spread of antibiotic resistant bacteria; and harm to fish, wildlife and biodiversity. Most of the USRSB's indicators and metrics do not focus specifically on reducing impacts. Instead, the metrics tend to be practice-based rather than results-based (mostly verifying the mere development of a nutrient management plan "or equivalent," not focused on its outcomes or even its implementation details). In that sense, the metrics fail to serve as credible indicators of whether plans were effectively implemented and generate genuine improvements for America's lands, air, water, and communities. Their vagueness—coupled with the lack of meaningful performance measures—raise major doubts that the USRSB's sustainability framework will produce significant improvements to livestock management in feedlots.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition of an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p> <p>The USRSB has identified six high priority sustainability indicators which are covered extensively in the sustainability framework and address water, land and air resources, as well as animal health and well-being. For each sector of the value chain, we have identified metrics and resources to help individual operations continuously improve over time.</p>
427	<p>Why is train employees on proper handling and care the only section here recommends a plan to verify efforts (evaluate)?</p>	<p>Training on BQA principals is critical to animal health and well-being. Ensuring that this training occurs is the responsibility of beef producers. Other producers sectors are also encouraged to implement systems to ensure training occurs.</p>
428	<p>Wildlife Resources - While X has a historical and fundamental connection with Wildlife Management, it is not clear why this section exists in the Cow/Calf Sector of this document. We do acknowledge that this section is very general, it seems somewhat forced into the document as a placeholder. For what we do not clearly understand by the</p>	<p>USRSB asserts that wildlife resources, while related to other parameters, represent potential positive and negative grazing impacts that are not measured under any other indicator; thus, they are included here.</p>
429	<p>With out knowing the true meaning of Continuous Improvement it sounds like a unattainable goal that would be used to control the PRODUCER!...DANGEROUS!</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition of an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p>
430	<p>With the change in market demand for fresh food a good time for this sector to market sustainable beef from the 6 indicators to help share the costs of these changes with the cow-calf sector who is open to more adversity (drought, fire, conflict with carnivores, etc.)</p>	<p>Thank you for your comment. The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition of an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Engagement in business-to-business ventures is out of scope for the USRSB.</p>
431	<p>X also recommends that the discussion of regional be clarified. The important concept isn't that only some elements should be considered regionally.; rather it is the details of what needs to be considered will vary regionally. Providing specific examples is not a common feature of the framework, but tangible examples would provide important clarity regarding the intent of this section, either in the framework or in supporting documents or reference resources.</p>	<p>The USRSB intends the Framework to be a place for producers to find the resources they need to begin or evaluate their GMP, with the full understanding that all GMPs will be a set of site or operation-specific considerations. USRSB has clarified this intent and expanded the resource section based on your comment.</p> <p>USRSB acknowledges the importance of recognizing the co-benefits of the framework elements and we have included language in the introduction that calls this out.</p>
432	<p>X also strongly supports the auction markets and feedyard metrics. These metrics recognize the most critical points of environmental sustainability by allowing each operation to craft a strategy that fits within their climate, geography and budget, but encourages them to continue to seek out improvements regardless of whatever point they are at today. We also specifically support the recognition by the auction market sector to focus on the indicators where they can have an impact. Some important examples in the metrics that provide feedyards and auctions with the flexibility necessary to implement the framework at feedyards include metrics such as the Beef Quality Assurance Program to address Animal Health and Well-being; a Nutrient Management Plan to help manage Land Resources (for feedyards); and employee safety programs and trainings focused on the key elements outlined in the Employee Safety and Well-being indicator.</p>	<p>We appreciate your support</p>
433	<p>X also strongly supports the auction markets and feedyard metrics. These metrics recognize the most critical points of environmental sustainability by allowing each operation to craft a strategy that fits within their climate, geography and budget, but encourages them to continue to seek out improvements regardless of whatever point they are at today. We also specifically support the recognition by the auction market sector to focus on the indicators where they can have an impact. Some important examples in the metrics that provide feedyards and auctions with the flexibility necessary to implement the framework at feedyards include metrics such as the Beef Quality Assurance Program to address Animal Health and Well-being; a Nutrient Management Plan to help manage Land Resources (for feedyards); and employee safety programs and trainings focused on the key elements outlined in the Employee Safety and Well-being indicator.</p>	<p>We appreciate your support.</p>

434	<p>x also strongly supports the auction markets and feedyard metrics. These metrics recognize the most critical points of environmental sustainability by allowing each operation to craft a strategy that fits within their climate, geography and budget, but encourages them to continue to seek out improvements regardless of whatever point they are at today. We also specifically support the recognition by the auction market sector to focus on the indicators where they can have an impact. Some important examples in the metrics that provide feedyards and auctions with the flexibility necessary to implement the framework at feedyards include metrics such as the Beef Quality Assurance Program to address Animal Health and Well-being; a Nutrient Management Plan to help manage Land Resources (for feedyards); and employee safety programs and trainings focused on the key elements outlined in the Employee Safety and Well-being indicator.</p>	<p>We appreciate your support.</p>
435	<p>X also supports the USRSB description of continuous improvement and feel strongly that the cattle industry will continue to improve, as we have always done. It's our hope the USRSB and our supply chain partners recognize the great foundation which has already been built and will help the producer-end of the supply-chain build upon that foundation.</p>	<p>Thank you for your support. The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p>
436	<p>X 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. X suggested changes are provided below.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the process we have followed and will follow in the future that has led to the development of the by sector SAGS. Additionally, the Framework was revised for consistency across all Sectors, to the extent possible, without losing by sector relevance.</p>
437	<p>X appreciates this opportunity to comment on the USRSB sustainability framework. These comments refer to Animal Health and Wellbeing metrics (starting at Line 408). The selection and dissemination of antibiotic resistance and the resulting threat to human and animal health is one of the major challenges to the sustainability of the food system. The framework as currently proposed falls far short in addressing this critical sustainability issue. X supports the inclusion of the fourteen recommendations on antimicrobial stewardship but these recommendations are not tied to any specific metrics and are not adequate to meet the urgent public and animal health crisis of antibiotic resistance. Any set of metrics for animal health and antimicrobial stewardship must include the tracking and reporting of antimicrobial use. There should also be metrics in place to measure common animal health challenges in the feedlot such as number of animals treated for respiratory disease and overall mortality. Two of the most important of the fourteen recommendations are to consider therapeutic alternatives "prior to using antimicrobial therapy" and "avoid using antibiotics important in human medicine as first line therapy." Both of these recommendations should lead to overall reductions in antibiotic use and in the reduction of the use of antibiotics important in human medicine, but there are no recommendation to reduce antibiotic use in the metrics. X recommends a specific metric related to reducing overall antibiotic use and more importantly the use of medically important antibiotics. Similarly, there is a recommendation to "Treat the fewest number of animals possible: Limit antibiotic use to sick or at-risk animals." X recommends that this be strengthened to limit antibiotic use to sick animals or animals in contact with sick animals and that the use of antibiotics for disease prevention be prohibited unless animals are injured or undergoing surgery. There should be a metric related to the number of animals treated preventively with the goal of moving this number to zero. One way to avoid preventive antibiotic use is to limit the number of high risk cattle entering the feedlot by purchasing from suppliers with known health programs (backgrounding). We urge the USRSB to establish specific industry goals and targets around responsible antibiotics use. These should include reductions in overall antibiotic use and ultimately the elimination of routine preventive use of medically important antibiotics. This is consistent with recommendations issued by the World Health Organization in November 2017. (http://www.who.int/foodsafety/areas_work/antimicrobial-resistance/cia_guidelines/en/) The USRSB should also include metrics related to morbidity and mortality among feedlot cattle, and measures related to specific health practices such as vaccination, backgrounding, and providing adequate diets to reduce the incidence of liver abscesses.</p>	<p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p> <p>Cattle producers have studied a number of approaches over the years for pre-conditioning cattle. While there are many positives to this recommendation, many times cattle producers have a limited ability to provide pre-conditioned calves to the market place. This is primarily due to the average cow herd size in the U.S. of ~40 cows and limited facilities, time and resources for those small producers to pre-condition calves. At the same time, we support the idea of putting emphasis on this topic and added more language on pre-conditioning.</p>
438	<p>X appreciates this opportunity to comment on the USRSB sustainability framework. We support the USRSB sentiment around continuous improvement in beef sustainability as well as recommendations that the retail and foodservice sector not only engage their suppliers on these issues but also measure and report progress on antibiotic use reduction within their corporate supply chains. We also appreciate the Roundtable's acknowledgement of significant consumer interest in animal health and welfare, including and especially related to antibiotic use in livestock operations. It is good to see that several of the SAGs do include discussion of antimicrobial stewardship. However, we remain disappointed that antibiotic stewardship is not discussed at a higher level within the framework, among the top-level USRSB indicators and metrics of sustainability. Antibiotics are vital tools for both animal and human health, and any effort to ensure the long-term sustainability of the beef industry should include a strong emphasis on keeping these tools effective for future generations of animals and people. We are especially concerned that although this SAG includes mention of antimicrobial stewardship, it relies exclusively on the Beef Quality Assurance Program and "judicious use" principles. Given the scale and scope of the bacterial resistance crisis globally, this approach will not be sufficient. The spread of antibiotic resistance, which is directly tied to antibiotic use both in human medicine and animal agriculture, is an urgent public health crisis that threatens to reverse the public health gains of the last century. The Centers for Disease Control and Prevention conservatively estimates that at least 2 million Americans contract resistant infections each year; and at least 23 Auction Market - Air and Greenhouse Gases,000 die from such infections. A recent report commissioned by the UK government estimates that by 2050, drug-resistant bacteria could kill 10 million people worldwide every year. Despite this threat, industrial feedyards are feeding large quantities of antibiotics to beef cattle unnecessarily. In the U.S. alone, 70 percent of medically important antibiotics are sold for use in food animals. In many cases, meat producers routinely give antibiotics to animals that aren't sick in order to prevent disease brought on or spread by unsanitary and overcrowded conditions on industrial farms. In November 2017, the World Health Organization (WHO) released new guidelines for the use of medically important antibiotics in food animals, calling for the elimination of all routine antibiotic use when animals are not sick, whether the antibiotics are used to speed up growth (growth promotion) OR to compensate for stressful or unsanitary conditions (disease prevention). We are particularly disappointed that this USRSB SAG does not acknowledge the need to reduce antibiotic use and to eliminate routine uses of medically important antibiotics for growth promotion and disease prevention purposes. There is significant reason to believe that USRSB's approach to antibiotics use in the beef sector will worsen, not help solve, the beef industry's overuse of antibiotics, which already threatens the viability of critical human medicines. We urge companies in the retail and foodservice sectors to set antibiotic stewardship policies for their beef supplies that align with the following principles: 1. Antibiotics should only be used to treat the presence of disease in animals diagnosed by a licensed veterinarian, and in limited circumstances to control disease outbreaks. Antibiotics should not be used to promote faster growth or for disease prevention. 2. Antibiotic use should be supervised by a veterinarian familiar with the premises and the animals. 3. Producers should report their use of antibiotics so that oversight agencies and the public can track progress in meeting use reduction goals and identify resistance risks and trends. 4. Producers should work with a third-party audit program to verify that the purchasing company's antibiotics use policies are being met. Audit reports should be summarized and made public annually, to ensure transparency. 5. Producers should rely on better husbandry practices to improve animal health and welfare, and to minimize the need for routine antibiotics use on farms. We also urge the USRSB to establish specific industry</p>	<p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship. The antibiotic discussion was further developed in both the Cow-calf and Feedyard Animal Health and Well-being sections.</p>

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Antibiotics are vital tools for both animal and human health, and any effort to ensure the long-term sustainability of the beef industry should include a strong emphasis on keeping these tools effective for future generations of animals and people. We are especially concerned that although this SAG includes mention of antimicrobial stewardship, its relies exclusively on the Beef Quality Assurance Program and judicious use principles. Given the scale and scope of the bacterial resistance crisis globally, this approach will not be sufficient. The spread of antibiotic resistance, which is directly tied to antibiotic use both in human medicine and animal agriculture, is an urgent public health crisis that threatens to reverse the public health gains of the last century. The Centers for Disease Control and Prevention conservatively estimates that at least 2 million Americans contract resistant infections each year; and at least 23 Auction Market - Air and Greenhouse Gases,000 die from such infections. A recent report commissioned by the UK government estimates that by 2050, drug-resistant bacteria could kill 10 million people worldwide every year. Despite this threat, industrial feedyards are feeding large quantities of antibiotics to beef cattle unnecessarily. In the U.S. alone, 70 percent of medically important antibiotics are sold for use in food animals. In many cases, meat producers routinely give antibiotics to animals that aren't sick in order to prevent disease brought on or spread by unsanitary and overcrowded conditions on industrial farms. In November 2017, the World Health Organization (WHO) released new guidelines for the use of medically important antibiotics in food animals, calling for the elimination of all routine antibiotic use when animals are not sick, whether the antibiotics are used to speed up growth (growth promotion) OR to compensate for stressful or unsanitary conditions (disease prevention). We are particularly disappointed that this USRSB SAG does not acknowledge the need to reduce antibiotic use and to eliminate routine uses of medically important antibiotics for growth promotion and disease prevention purposes. There is significant reason to believe that USRSB's approach to antibiotics use in the beef sector will worsen, not help solve, the beef industry's overuse of antibiotics, which already threatens the viability of critical human medicines. We urge companies in the retail and foodservice sectors to set antibiotic stewardship policies for their beef supplies that align with the following principles: 1. Antibiotics should only be used to treat the presence of disease in animals diagnosed by a licensed veterinarian, and in limited circumstances to control disease outbreaks. Antibiotics should not be used to promote faster growth or for disease prevention. 2. Antibiotic use should be supervised by a veterinarian familiar with the premises and the animals. 3. Producers should report their use of antibiotics so that oversight agencies and the public can track progress in meeting use reduction goals and identify resistance risks and trends. 4. Producers should work with a third-party audit program to verify that the purchasing company's antibiotics use policies are being met. Audit reports should be summarized and made public annually, to ensure transparency. 5. Producers should rely on better husbandry practices to improve animal health and welfare, and to minimize the need for routine antibiotics use on farms. We also urge the USRSB to establish specific industry</p>	<p>We appreciate your support for how we have added specific content on antibiotic stewardship for cattle producers.</p> <p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability.</p> <p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p> <p>While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level is most appropriate for them.</p> <p>The value chain relies extensively on FDA review and approval of antimicrobials for use in cattle production that is managed under the supervision of a veterinarian within a veterinarian-client-patient relationship (VCPR), which addresses many of the points you have made in your numbered comments #1-#5.</p>
440	<p>X appreciates this opportunity to comment on the USRSB sustainability framework. We support the USRSB sentiment around continuous improvement in beef sustainability as well as recommendations that the retail and foodservice sector not only engage their suppliers on these issues but also measure and report progress on antibiotic use reduction within their corporate supply chains. We also appreciate the Roundtable's acknowledgement of significant consumer interest in animal health and welfare, including and especially related to antibiotics use in livestock operations. It is good to see that several of the SAGs do include discussion of antimicrobial stewardship. However, we remain disappointed that antibiotic stewardship is not given higher priority within the framework, among the top-level USRSB indicators and metrics of sustainability. Antibiotics are vital tools for both animal and human health, and any effort to ensure the long-term sustainability of the beef industry should include a strong emphasis on keeping these tools effective for future generations of animals and people. We are especially concerned that although this SAG includes mention of antimicrobial stewardship, its relies exclusively on the Beef Quality Assurance Program and "judicious use" principles. Given the scale and scope of the bacterial resistance crisis globally, this approach will not be sufficient. The spread of antibiotic resistance, which is directly tied to antibiotic use both in human medicine and animal agriculture, is an urgent public health crisis that threatens to reverse the public health gains of the last century. The Centers for Disease Control and Prevention conservatively estimates that at least 2 million Americans contract resistant infections each year; and at least 23 Auction Market - Air and Greenhouse Gases,000 die from such infections. A recent report commissioned by the UK government estimates that by 2050, drug-resistant bacteria could kill 10 million people worldwide every year. Despite this threat, industrial feedlots are feeding large quantities of antibiotics to beef cattle unnecessarily. In the U.S. alone, 70 percent of medically important antibiotics are sold for use in food animals. In many cases, meat producers routinely give antibiotics to animals that aren't sick in order to prevent disease brought on or spread by unsanitary and overcrowded conditions on industrial farms. This practice breeds antibiotic resistant bacteria that can travel off farms to potentially infect people. U.S. PIRG and Consumers Union conducted a poll of physicians in 2014 that found 93 percent of those surveyed expressed concern about the use of antibiotics in livestock production facilities on healthy animals in order to promote growth and prevent disease. In November 2017, the World Health Organization (WHO) released new guidelines for the use of medically important antibiotics in food animals, calling for the elimination of all routine antibiotic use when animals are not sick, whether the antibiotics are used to speed up growth (growth promotion) OR to compensate for stressful or unsanitary conditions (disease prevention). The USRSB SAG does not acknowledge the need to reduce antibiotic use and to eliminate routine uses of medically important antibiotics for growth promotion and disease prevention purposes. There is significant reason to believe that USRSB's approach to antibiotics use in the beef sector will not help solve the beef industry's overuse of antibiotics, which already threatens the viability of critical human medicines. Several members of the USRSB have begun sourcing chicken products raised without the routine use of medically important antibiotics and should apply that same standard to the rest of their meat supply chain. We urge companies in the retail and foodservice sectors to set antibiotic stewardship policies for their beef supplies that align with the following principles: 1. Antibiotics should only be used to treat the presence of disease in animals diagnosed by a licensed veterinarian, and in limited circumstances to control disease outbreaks. Antibiotics should not be used to promote faster growth or for disease prevention. 2. Antibiotic use should be supervised by a veterinarian familiar with the premises and the animals. 3. Producers should report their use of antibiotics so that oversight agencies and the public can track progress in meeting use reduction goals and identify resistance risks and trends. 4. Producers should work with a third-party audit program to verify that the purchasing company's antibiotics use policies are being met. Audit reports should be summarized and made public annually, to ensure transparency. 5. Producers should rely on better husbandry practices</p>	<p>While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level is most appropriate for them.</p> <p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p> <p>In response to putting antibiotics as an indicator, the USRSB indicator development process used Materiality Matrix prioritization exercises which resulted in 13 initial indicators identified as top priorities. These 13 initial priorities were selected as the sustainability indicators that the IWG would propose to the USRSB members. The discussion from IWG members turned to aggregation of indicators versus separation; in particular, the discussions focused on indicators in Animal and Economic sustainability domains. Some sectors favored including both Animal Health and Animal Wellbeing as Animal indicators, but others favored combining those two indicators under Animal Wellbeing. All agreed that metrics for these indicators would encompass the use of technology and animal health.</p>
441	<p>X appreciates this opportunity to comment on the USRSB sustainability framework. We support the USRSB sentiment around continuous improvement in beef sustainability as well as recommendations that the retail and foodservice sector not only engage their suppliers on these issues but also measure and report progress on antibiotic use reduction within their corporate supply chains. We also appreciate the Roundtable's acknowledgement of significant consumer interest in animal health and welfare, including and especially related to antibiotics use in livestock operations. It is good to see that several of the SAGs do include discussion of antimicrobial stewardship. However, we remain disappointed that antibiotic stewardship is not discussed at a higher level within the framework, among the top-level USRSB indicators and metrics of sustainability. Antibiotics are vital tools for both animal and human health, and any effort to ensure the long-term sustainability of the beef industry should include a strong emphasis on keeping these tools effective for future generations of animals and people. We are especially concerned that although this SAG includes mention of antimicrobial stewardship, its relies exclusively on the Beef Quality Assurance Program and "judicious use" principles. Given the scale and scope of the bacterial resistance crisis globally, this approach will not be sufficient. The spread of antibiotic resistance, which is directly tied to antibiotic use both in human medicine and animal agriculture, is an urgent public health crisis that threatens to reverse the public health gains of the last century. The Centers for Disease Control and Prevention conservatively estimates that at least 2 million Americans contract resistant infections each year; and at least 23 Auction Market - Air and Greenhouse Gases,000 die from such infections. A recent report commissioned by the UK government estimates that by 2050, drug-resistant bacteria could kill 10 million people worldwide every year. Despite this threat, industrial feedyards are feeding large quantities of antibiotics to beef cattle unnecessarily. In the U.S. alone, 70 percent of medically important antibiotics are sold for use in food animals. In many cases, meat producers routinely give antibiotics to animals that aren't sick in order to prevent disease brought on or spread by unsanitary and overcrowded conditions on industrial farms. In November 2017, the World Health Organization (WHO) released new guidelines for the use of medically important antibiotics in food animals, calling for the elimination of all routine antibiotic use when animals are not sick, whether the antibiotics are used to speed up growth (growth promotion) OR to compensate for stressful or unsanitary conditions (disease prevention). We are particularly disappointed that this USRSB SAG does not acknowledge the need to reduce antibiotic use and to eliminate routine uses of medically important antibiotics for growth promotion and disease prevention purposes. There is significant reason to believe that USRSB's approach to antibiotics use in the beef sector will worsen, not help solve, the beef industry's overuse of antibiotics, which already threatens the viability of critical human medicines. X urges companies in the retail and foodservice sectors to set antibiotic stewardship policies for their beef supplies that align with the following principles: 1. Antibiotics should only be used to treat the presence of disease in animals diagnosed by a licensed veterinarian, and in limited circumstances to control disease outbreaks. Antibiotics should not be used to promote faster growth or for disease prevention. 2. Antibiotic use should be supervised by a veterinarian familiar with the premises and the animals. 3. Producers should report their use of antibiotics so that oversight agencies and the public can track progress in meeting use reduction goals and identify resistance risks and trends. 4. Producers should work with a third-party audit program to verify that the purchasing company's antibiotics use policies are being met. Audit reports should be summarized and made public annually, to ensure transparency. 5. Producers should rely on better husbandry practices to improve animal health and welfare, and to minimize the need for routine antibiotics use on farms. We also urge the USRSB to establish specific industry</p>	<p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p>

442	<p>X appreciates this opportunity to comment on the USRSB sustainability framework. We support the USRSB sentiment around continuous improvement in beef sustainability. While there was no reference to antibiotics use in the USRSB top-level indicators and metrics, it is good to see that this SAG includes a discussion of antimicrobial stewardship and offers concrete recommendations. However, we remain disappointed that antibiotic stewardship is not discussed at a higher level within the framework, among the top-level USRSB indicators and metrics of sustainability. Antibiotics are vital tools for both animal and human health, and any effort to ensure the long-term sustainability of the beef industry should include a strong emphasis on keeping these tools effective for future generations of animals and people. This SAG includes fourteen recommendations on antimicrobial stewardship but they do not go nearly far enough to address the health threat posed by antibiotic resistance. We are particularly disappointed that USRSB merely discourages subtherapeutic antibiotics uses and includes disease prevention as an accepted use of antibiotics. The framework does not acknowledge the need to reduce overall antibiotic use and to eliminate routine uses of medically important antibiotics for growth promotion and disease prevention purposes. There is significant reason to believe that USRSB's approach to antibiotics use in the beef sector will worsen, not help solve, the beef industry's overuse of antibiotics, which already threatens the viability of critical human medicines. In addition, the proposed metrics for animal health and welfare do not specifically refer back to the indicator and instead focus on a variety of animal health related activities in the Beef Quality Assurance Program, including a few related to antimicrobial stewardship. These metrics should clearly refer back to the fourteen recommendations in the indicator and include some measure of whether or not they are being followed and effectively reducing inappropriate antibiotic uses like disease prevention. Any attempt to address the sustainability of antibiotic use must include tracking antibiotic use per animal produced and include specific indicators related to numbers and/or percent of animals treated. Most feedlots feed the first-line medically important antibiotic, tylosin, to all cattle for the entire feeding period to reduce liver abscesses that result from inappropriate high-energy diets. This practice contradicts multiple recommendations in the list, so there should be metrics that measure how this and other practices inconsistent with the indicator are curtailed and eventually eliminated. We urge the USRSB to establish specific industry goals and targets around responsible antibiotics use. These should include reductions in overall antibiotic use and ultimately the elimination of routine preventive use of medically important antibiotics. This is consistent with recommendations issued by the World Health Organization in November 2017.</p>	<p>We appreciate your support for how we have added specific content on antibiotic stewardship for cattle producers.</p> <p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability.</p> <p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p> <p>While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level is most appropriate for them.</p>
443	<p>X appreciates this opportunity to comment on the USRSB sustainability framework. We support the USRSB sentiment around continuous improvement in beef sustainability. While there was no reference to antibiotics use in the USRSB top-level indicators and metrics, it is good to see that this SAG includes a discussion of antimicrobial stewardship and offers concrete recommendations. However, we remain disappointed that antibiotic stewardship is not discussed at a higher level within the framework, among the top-level USRSB indicators and metrics of sustainability. Antibiotics are vital tools for both animal and human health, and any effort to ensure the long-term sustainability of the beef industry should include a strong emphasis on keeping these tools effective for future generations of animals and people. This SAG includes fourteen recommendations on antimicrobial stewardship but they do not go nearly far enough to address the health threat posed by antibiotic resistance. We are particularly disappointed that USRSB merely "discourages" subtherapeutic antibiotics uses and includes "disease prevention" as an accepted use of antibiotics. The framework does not acknowledge the need to reduce overall antibiotic use and to eliminate routine uses of medically important antibiotics for growth promotion and disease prevention purposes. There is significant reason to believe that USRSB's approach to antibiotics use in the beef sector will worsen, not help solve, the beef industry's overuse of antibiotics, which already threatens the viability of critical human medicines. In addition, the proposed metrics for animal health and welfare do not specifically refer back to the indicator and instead focus on a variety of animal health related activities in the Beef Quality Assurance Program, including a few related to antimicrobial stewardship. These metrics should clearly refer back to the fourteen recommendations in the indicator and include some measure of whether or not they are being followed and effectively reducing inappropriate antibiotic uses like disease prevention. Any attempt to address the sustainability of antibiotic use must include tracking antibiotic use per animal produced and include specific indicators related to numbers and/or percent of animals treated. Most feedlots feed the first-line medically important antibiotic, tylosin, to all cattle for the entire feeding period to reduce liver abscesses that result from inappropriate high-energy diets. This practice contradicts multiple recommendations in the list, so there should be metrics that measure how this and other practices inconsistent with the indicator are curtailed and eventually eliminated. X urges the USRSB to establish specific industry goals and targets around responsible antibiotics use. These should include reductions in overall antibiotic use and ultimately the elimination of routine preventive use of medically important antibiotics. This is consistent with recommendations issued by the World Health Organization in November 2017.</p>	<p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p> <p>The USRSB is a voluntary, full value chain, multi-stakeholder organization. The USRSB does not own cattle, nor does it dictate production practices or marketing claims. The current references to the BQA program and 14 guidelines list for judicious use of antimicrobials have been recognized by the USRSB members as the most appropriate starting place to message to cattle producers, the value chain and beef consumers that antimicrobial stewardship is an important issue.</p> <p>While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level is most appropriate for them.</p>
444	<p>X appreciates this opportunity to comment on the USRSB sustainability framework. While we support the USRSB vision and mission of continuous improvement in beef sustainability, we remain disappointed that the USRSB does not include membership by consumer groups focused on food safety and public health. This lack of inclusion represents a missed opportunity for communication and will ultimately undermine efforts by the USRSB to establish credibility with consumers. While there was no reference to antibiotics use in the USRSB top-level indicators and metrics, we are encouraged that many of the SAGs do include discussion of judicious use of antibiotics. However, we remain disappointed that antibiotic stewardship is not discussed at a higher level within the framework, among the indicators and metrics of sustainability. Antibiotics are vital tools for both animal and human health, and any effort to ensure the long-term sustainability of the beef industry should include a strong emphasis on keeping these tools effective for future generations of producers and consumers. Antibiotic resistance is important to the beef industry because of its impact on the long-term animal and producer health. High rates of multi-drug resistant bacteria associated with bovine respiratory disease have been detected in U.S. cattle, and studies from the US and elsewhere that have found elevated levels of MRSA among people who live or work in close proximity to animals. Antibiotics use is also clearly a key issue for consumers. In the 2017 Beef Checkoff Consumer Image Index, antibiotics use was listed among the top unprompted concerns by consumers, ranking above other environmental issues, such as methane emissions and global warming. (Source: www.beefissuesquarterly.org/CMDocs/BeefResearch/MR_Presentations/ConsumerImageIndex.pdf) In addition to prioritizing antibiotics stewardship, we advise that transparency and clear communication are essential in any effort to build trust with consumers. Consumers will continue to lack trust in the USRSB effort until it includes specific, meaningful, and verifiable measures of improvement on aspects of sustainability. For antibiotics stewardship, such indicators could include ensuring practices known to promote animal health and reduce the need for antibiotics (e.g. vaccination), restrictions on specific uses or classes of uses for antibiotics (e.g. routine use for prevention of liver abscesses), requirements for tracking and reporting antibiotics usage, and targets for reducing overall incidence of animal disease and/or antibiotics use.</p>	<p>USRSB welcomes individuals and entities to the table who share a commitment to the Mission and Vision of the USRSB.</p> <p>Thank you for offering support for how we have added specific content on antibiotic stewardship for cattle producers. We also agree with your comment that states, "Antibiotics are vital tools for both animal and human health, and any effort to ensure the long-term sustainability of the beef industry should include a strong emphasis on keeping these tools effective for future generations of producers and consumers."</p> <p>The USRSB is a voluntary, full value chain, multi-stakeholder organization. The USRSB does not own cattle, nor does it dictate production practices or marketing claims. The current references to the BQA program and 14 guidelines list for judicious use of antimicrobials have been recognized by the USRSB members as the most appropriate starting place to message to cattle producers, the value chain and beef consumers that antimicrobial stewardship is an important issue.</p> <p>While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level is most appropriate for them.</p>

445	<p>X appreciates this opportunity to comment. We have the following comment on the animal health section of the Feedyard SAG: We appreciate that the Feedyard SAG includes reference to the BQA principles for judicious antimicrobial use. However, while the BQA principles recognize important goals for judicious use, they often lack the specificity needed to make them easy to verify as a part of a sustainability metric. For example, while the principles describe avoiding using antibiotics important in human medicine as first line therapy, they do not describe which antibiotics are considered important in human medicine or what alternatives should be tried first. Antibiotics use in feedyards represents a high priority for consumers, who often have negative impressions of this sector of the industry. Identifying meaningful, measurable, and verifiable progress in this space would be an essential step in building trust with consumers and transforming the image of this sector. We encourage you recommend specific management practices that can reduce disease pressure and the need for antibiotics use. This should include recommending that the first-line approach to reducing the incidence of liver abscesses be non-antibiotic nutritional management (i.e. provision of increased roughage during growing and finishing periods). Increasing the percentage of coarse roughage in the diets has been shown to be highly effective in reducing liver abscesses, while not carrying a risk of contributing to antibiotic resistance. One recent review of approaches to controlling liver abscesses, conducted by faculty at Kansas State and New Mexico State Universities, concluded "Providing a source of true scratch-factor to the rumen, appears to be the most effective method of reducing LA." Source: www.sciencedirect.com/science/article/pii/S1080744615300449. We also recommend that the feedyard sector work with the cow-calf sector to reduce the number of "high risk" cattle entering feedyards. This should include defining appropriate criteria for pre-conditioning calves, including vaccination, deworming/delousing, an appropriate weaning period, and preparing weaned calves for the nutrition they will receive at the feedyard. Cattle marketed under a "sustainability" certification should be required to comply with these preconditioning recommendations. We also recommend that the feedyard sector, in coordination with other sectors of the industry, identify specific targets for reducing bovine respiratory disease and/or other leading infectious diseases that cause animal morbidity and mortality, which also contribute to antibiotics use. We note that the National Pork Board recently set concrete targets for reducing the sero-prevalence of <i>Toxoplasma gondii</i> in sows and <i>Salmonella</i> in pork trimmings, and urge you to similarly consider disease reduction targets for the beef industry. Source: www.pork.org/about/strategic-plan. We also encourage you to set goals and targets for reducing overall antibiotics use, as well as use of antibiotics from specific classes important to human medicine. We recognize that antibiotics use in animal agriculture is necessary for animal health, and the sustainability metrics should not be designed in a way that coerces farmers into denying animals necessary medical care. However, we note that even in human medicine, where the need for antibiotics in medical care is undisputed, the Centers of Disease Control and Prevention has clearly-defined targets for reducing inappropriate use of antibiotics by 50% in outpatient settings and 20% in inpatient settings by 2020. Source: www.cdc.gov/drugresistance/pdf/national_action_plan_for_combating_antibiotic-resistant_bacteria.pdf. The cattle industry should similarly define and set targets for reducing inappropriate antibiotics use. Such targets, if achieved, would be represent meaningful, measurable, and verifiable, important to building consumer confidence in the beef industry. We encourage feedyards to work with the auction industry to develop user-friendly, verifiable and standardized animal health recordkeeping systems to allow buyers to more easily verify vaccinations, antibiotics use, days since weaning, and other factors that affect animal health or disease risk. Such animal health recordkeeping would make it easier for feedyard operators to encourage and reward cow-calf producers who prioritize animal health. It would also help feedyard operators to avoid unnecessary antibiotics use by making it easier to calculate health risks for recently-purchased cattle. Finally, better health records would facilitate greater trust by consumers, who increasingly want information about medication and other animal health practices throughout the animal's life cycle.</p>	<p>While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level is most appropriate for them.</p> <p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRFB statement on antimicrobial stewardship.</p> <p>Non-antibiotic nutritional management is an area where the cattle feeding industry continues to support science-based research to further our understanding of the etiology of liver abscesses.</p> <p>Cattle producers have studied a number of approaches over the years for pre-conditioning cattle. While there are many positives to this recommendation, many times cattle producers have a limited ability to provide pre-conditioned calves to the market place. This is primarily due to the average cow herd size in the U.S. of ~40 cows and limited facilities, time and resources for those small producers to pre-condition calves. At the same time, we support the idea of putting emphasis on this topic and added more language on pre-conditioning.</p> <p>The auction sector as represented by Livestock Marketing Association advocates for the continued education of producers in the judicious use of antibiotics. LMA has implemented a documentation process for consignors to certify that animals are not within a drug residue withdrawal period. As part of this process, a disclosure announcement is made prior to sale of livestock that have not yet met the recommended withdrawal periods by the manufacturer or are consigned by producers currently listed on the FSIS Repeat Residue Violator's List. Livestock producers take the lead role in their on-farm animal health recordkeeping.</p>
446	<p>X believes the key to realizing continuous improvement in the U.S. beef industry was to develop metrics that have a positive impact on sustainability outcomes while at the same time are technologically feasible, geographically neutral, and economically practical for producers. Without these three key elements, the metric will not be adopted or implemented. As presented the metrics as a whole will make a marked improvement in the sustainability of our industry if we can get them into the hands of producers and provide a value proposition.</p>	<p>We appreciate your support.</p>
447	<p>X believes the key to realizing continuous improvement in the U.S. beef industry was to develop metrics that have a positive impact on sustainability outcomes while at the same time are technologically feasible, geographically neutral, and economically practical for producers. Without these three key elements, the metric will not be adopted or implemented. As presented the metrics as a whole will make a marked improvement in the sustainability of our industry if we can get them into the hands of producers and provide a value proposition.</p>	<p>We agree that upon completion of this work product, outreach and education must be a top priority.</p>
448	<p>X believes the key to realizing continuous improvement in the U.S. beef industry was to develop metrics that have a positive impact on sustainability outcomes, while at the same time are technologically feasible, geographically neutral, and economically practical for producers. Without these three key elements, the metric will not be adopted or implemented. As presented, the metrics will make a marked improvement in the sustainability of our industry, if we can provide a value proposition for producers to implement</p>	<p>We appreciate your support.</p>
449	<p>X encourages new partnerships and a higher level of transparency across the beef supply chain as cattle are traced from birth to harvest. The goal is creating a practical implementation of the six USRSB indicators at every level of the beef supply chain with the intent of measuring current performance in order to inspire and drive continuous improvement in the area of sustainability. Through our work with the pilot project, we hope to create a movement toward better cooperation across the beef supply chain in order to continually focus on improvement in the area of beef production sustainability. Thank you for the opportunity to provide feedback.</p>	<p>Traceability was addressed by USRSB members during the development of the indicator and metric report. The statement below was approved by the cow-calf, auction market and feedyard producers during webinars held in Aug. 2017 and was included in the Indicator and Metric Report and publicly available Indicator and Metric Summary Report in Nov. 2017:</p> <p>"The USRSB recognizes the necessity of animal identification for the U.S. beef cattle herd to measure success and improvements in sustainability and embraces a nationwide goal of animal identification for purposes of disease traceability, herd security, consumer confidence, quality improvement, international market access, and a means to participate in supply chain programs that can offer value-added benefits."</p> <p>Based on your comment, we have added language about traceability, in the Framework introduction section. The traceability language was previously included in the USRSB Indicator and Metric Summary</p>
450	<p>X has the following comment on the animal health section of the Auction Market SAG: We support many of the specific actions recommended to control antibiotic residues in meat entering the food supply. In particular, the recommendations to declare livestock consigned by an individual listed in the Repeat Residue Violators Report is a concrete, useful step to support compliance with drug withdrawal periods. We encourage the auction industry to develop user-friendly, verifiable and standardized animal health recordkeeping systems to allow buyers to more easily verify vaccinations, antibiotics use, days since weaning, and other factors that affect animal health or disease risk. Such animal health recordkeeping would make it easier for producers to be rewarded financially for taking measures to benefit animal health. It would also help buyers avoid unnecessary antibiotics use by making it easier to calculate health risks for recently-purchased cattle. Finally, better health records would facilitate greater trust by consumers, who increasingly want information about medication and other animal health practices throughout the animal's life cycle.</p>	<p>The auction sector as represented by Livestock Marketing Association advocates for the continued education of producers in the judicious use of antibiotics. LMA has implemented a documentation process for consignors to certify that animals are not within a drug residue withdrawal period. As part of this process, a disclosure announcement is made prior to sale of livestock that have not yet met the recommended withdrawal periods by the manufacturer or are consigned by producers currently listed on the FSIS Repeat Residue Violator's List. Livestock producers take the lead role in their on-farm animal health recordkeeping.</p>

451	<p>X has the following comment on the animal health section of the Cow + Calf SAG: We appreciate that the SAG includes reference to the BQA principles for judicious antimicrobial use. However, we recommend that antimicrobial stewardship be directly incorporated as part of the animal health metric as a fifth consideration, rather than provided as an additional educational resource, as it is in the current version of the SAG posted online. In addition, we encourage you to develop more standardized national approach to controlling infectious diseases, particularly bovine respiratory disease, which accounts for much of the cattle morbidity and mortality in the United States, serving as a driver of antibiotic use. Recommendations for fighting infectious disease should be standardized in order to address national disease risks, rather than based on local conditions. While we recognize that the cow-calf industry is diverse, cattle produced by this sector are often sold on a national market, traveling hundreds of miles and being co-mingled with cattle from across the country. This means disease risk is a national, rather than purely local problem. Another reason to emphasize standard recommendations is that decisions based on the personal judgement and experience of individual producers do not always lead to the best health outcomes for industry overall. A decision such as whether to vaccinate may be economically beneficial for industry, but may not always generate worthwhile economic returns for individual producers. An industry-wide collaborative effort like the USRSB is an important forum for the cattle industry to find ways to encourage and reward beneficial practices, promoting continuous improvement in fighting infectious disease. We recommend that the cow-calf sector work with the feedyard sector to define and encourage specific, science-based recommendations to reduce the number of high risk cattle entering later stages of production. Examples include: vaccination, deworming/delousing, an appropriate weaning period, and preparation of weaned calves for the nutrition they will receive during the next phase of production. Cattle marketed under a sustainability certification could then be required to comply with preconditioning recommendations. We also recommend that the cow-calf sector, in coordination with other beef industry sectors, identify specific targets for reducing bovine respiratory disease and other leading causes of animal morbidity and mortality, which contribute to antibiotics use. We note that the National Pork Board recently set concrete targets for reducing the sero-prevalence of Toxoplasma gondii in sows and Salmonella in pork trimmings, and urge you to similarly consider disease reduction targets for the beef industry. Source: www.pork.org/about/strategic-plan/. Finally, we urge you to recommend that cow-calf producers coordinate with other sectors of industry to maintain and report on antibiotics use with consistent, easily-transferable records. Such information would build consumer confidence in the beef they purchase by allowing antibiotics use to be tracked throughout the beef production cycle.</p>	<p>Thank you for recognizing the importance of the Beef Quality Assurance (BQA) program. Producer led programs such as BQA have led to improvements in beef quality, animal welfare and consumer trust. Many producers do participate in programs that better prepare cattle for transition to the next production phase and educational programs, updated research and market opportunities will likely continue to increase the number of cattle managed in this way.</p> <p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p> <p>Cattle producers have studied a number of approaches over the years for pre-conditioning cattle. While there are many positives to this recommendation, many times cattle producers have a limited ability to provide pre-conditioned calves to the market place. This is primarily due to the average cow herd size in the U.S. of ~40 cows and limited facilities, time and resources for those small producers to pre-condition calves. At the same time, we have put more emphasis on this topic.</p>
452	<p>X is in agreement with the high priority indicators. just as importantly as what has been identified is the process the organization used to identify them.</p>	<p>We appreciate your support.</p>
453	<p>X strongly supports the metrics for cow-calf producers under the indicators Land Resources, Water Resources and Air & Greenhouse Gas Emissions. USRSB has correctly identified a grazing management plan as having the greatest potential to significantly impact these indicators. GMPs are also familiar to the producer community, have a mountain of scientific research supporting them, and have many resources available to individual producers to help them in developing a GMP.</p>	<p>We appreciate your support.</p>
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458	<p>X strongly supports the metrics for cow-calf producers under the indicators Land Resources, Water Resources and Air & Greenhouse Gas Emissions. USRSB has correctly identified a grazing management plan as having the greatest potential to significantly impact these indicators. GMPs are also familiar to the producer community, have a mountain of scientific research supporting them, and have many resources available to individual producers to help them in developing a GMP.</p>	<p>We appreciate your support.</p>
459	<p>X supports the concept of continuous improvement as it relates to sustainability. Improvement is the goal, and that will vary by operation and by segment. Not setting levels of achievement is important and key to continued producer involvement and support.</p>	<p>We appreciate your support.</p>
460	<p>X supports the USRSB sentiment around continuous improvement in beef sustainability. While there was no reference to antibiotics use in the USRSB top-level indicators and metrics, it is good to see that this SAG includes a discussion of antimicrobial stewardship and offers concrete recommendations. However, we remain disappointed that antibiotic stewardship is not discussed at a higher level within the framework, among the top-level USRSB indicators and metrics of sustainability. Antibiotics are vital tools for both animal and human health, and any effort to ensure the long-term sustainability of the beef industry should include a strong emphasis on keeping these tools effective for future generations of animals and people. This SAG includes fourteen recommendations on antimicrobial stewardship but they do not go nearly far enough to address the health threat posed by antibiotic resistance. We are particularly disappointed that USRSB merely "discourages" subtherapeutic antibiotics uses and includes "disease prevention" as an accepted use of antibiotics. The framework does not acknowledge the need to reduce overall antibiotic use and to eliminate routine uses of medically important antibiotics for growth promotion and disease prevention purposes. There is significant reason to believe that USRSB's approach to antibiotics use in the beef sector will worsen, not help solve, the beef industry's overuse of antibiotics, which already threatens the viability of critical human medicines. In addition, the proposed metrics for animal health and welfare do not specifically refer back to the indicator and instead focus on a variety of animal health related activities in the Beef Quality Assurance Program, including a few related to antimicrobial stewardship. These metrics should clearly refer back to the fourteen recommendations in the indicator and include some measure of whether or not they are being followed and effectively reducing inappropriate antibiotic uses like disease prevention. Any attempt to address the sustainability of antibiotic use must include tracking antibiotic use per animal produced and include specific indicators related to numbers and/or percent of animals treated. Most feedlots feed the first-line medically important antibiotic tylosin to all cattle for the entire feeding period to reduce liver abscesses that result from inappropriate high-energy diets. This practice contradicts multiple recommendations in the list, so there should be metrics that measure how this and other practices inconsistent with the indicator are curtailed and eventually eliminated. We urge the USRSB to establish specific industry goals and targets around responsible antibiotics use. These should include reductions in overall antibiotic use and ultimately the elimination of routine preventive use of medically important antibiotics. This is consistent with recommendations issued by the World Health Organization in November 2017.</p>	<p>While it is not within the scope of USRSB to set specific goals within the supply chain, the business-to-business supply chain relationships may choose to implement these indicators and metrics at whatever level is most appropriate for them.</p> <p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p> <p>In response to putting antibiotics as an indicator, the USRSB indicator development process used Materiality Matrix prioritization exercises which resulted in 13 initial indicators identified as top priorities. These 13 initial priorities were selected as the sustainability indicators that the IWG would propose to the USRSB members. The discussion from IWG members turned to aggregation of indicators versus separation; in particular, the discussions focused on indicators in Animal and Economic sustainability domains. Some sectors favored including both Animal Health and Animal Wellbeing as Animal indicators, but others favored combining those two indicators under Animal Wellbeing. All agreed that metrics for these indicators would encompass the use of technology and animal health.</p>

461	<p>X would also like for USRSB to provide more fluidity throughout the different sectors of the Framework by having each sector start with only one metric per indicator. This would increase the flow and fluidity of the entire Framework. In anticipation that other commenters may suggest the reverse, X would respond that the success of the USRSB in its mission will depend on uptake of a voluntary system, and the greatest hope for significant uptake is to start at the single metric per indicator approach. If it is necessary to have additional metrics in a sector due to different types of entities, a grocery store versus fast food restaurant for example, then there needs to be an additional supply chain category created that has one metric per indicator.</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future. Each supply-chain sector was responsible for determining the best approach to metrics for their sector. That determination led to different approaches taken by different sectors. Each sector has provided a rationale for their determination.</p>
462	<p>Yes, agree and this will be done by.....</p>	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p>
463	<p>You could add that increased husbandry can result in less losses which reduces attracting carnivores in close proximity of cattle.</p>	<p>We have incorporated your suggestion.</p>
464	<ul style="list-style-type: none"> - supporting federal and/or state legislation requiring tracking of medically important antibiotic use and publicly reporting collected data on an annual basis. - adoption of the organic animal welfare rule. - banning hormones and growth promoters, including beta agonists. - opposing the Farm Bill provisions originally proposed in the House Agriculture committee bill that eviscerate key conservation programs and gut environmental enforcement and states' rights to pass human health, environmental, and animal welfare protections. - supporting increased conservation funding in the Farm Bill to enable greater technical assistance and support for producers. - increases in the minimum wage for workers - strong enforcement of existing Clean Water Act protections. - strong enforcement of existing protections for America's native fish, wildlife and plant biodiversity, especially endangered species and habitats; 	<p>The USRSB is a collaborative effort which focuses on voluntary improvements in beef sustainability. Based on your comment, we have made some clarifications through the addition on an introduction section outlining the scope and mission of USRSB, along with further clarification around the process we have followed and will follow in the future.</p> <p>Regulatory affairs and legislative lobbying are out of scope of the USRSB.</p> <p>Antibiotic stewardship is an important topic and scientific consensus is still developing. The USRSB has taken a science-based, collaborative approach to the entire process in order to drive continuous improvement in beef sustainability by focusing on outcomes without endorsing specific methodology or technology. As mentioned the USRSB has recognized the importance of this issue and referenced the GRSB statement on antimicrobial stewardship.</p> <p>The Sustainability Framework is meant to support and be adaptive to all types of beef production systems.</p>