

From: [Jerry Wulf](#)
To: [Horne, Willy - MRP-AMS](#)
Subject: [External Email]Comments on Instrument Grading and proposed changes
Date: Saturday, April 29, 2023 10:22:41 AM

[External Email]

If this message comes from an **unexpected sender** or references a **vague/unexpected topic**;
Use caution before clicking links or opening attachments.
Please send any concerns or suspicious messages to: Spam.Abuse@usda.gov

Dear Willie Horne and the USDA,

We have a long history of beef cattle production now spanning over 3 generations in our family. We have fed and marketed cattle for over 3/4's of a century and have participated in the evolution of fed cattle marketing for a long time. We have always believed in being early adopters of new and better ways to market fed cattle. Since the late 1980's and early 1990's we have sold our cattle on grids, taking the risk and reaping the rewards, of how our cattle have quality and yield graded.

We are thankful that there is a grading system in place to identify quality, hopefully expressed in a better eating experience that benefits our ultimate customer, the consumer. And also can send that message back to the cattle producer to strive for continued improvement. Likewise as we sell carcass weight, we appreciate a yield grade system that can predict red meat yield, very important to all participants in the beef supply-chain.

Given all that is at stake here for all participants, (including consumers) we have a very high level of interest in seeing that USDA grading is consistent and accurate.

We were selling cattle on grids long before the assistance of instrument grading. What we have witnessed after instruments were incorporated, is much more consistency in grading from plant to plant and from lot to lot of cattle, regardless of where they were harvested. We are convinced that with instrument assistance grading has gotten much better.

I have read the literature links on the website regarding grading and proposed changes. Observations I made in the comparison test done. Back in 2015 the grader and the instrument didn't agree 1% of the time. In the recent study, that number has jumped to 5%. I would have expected it to get better, not worse. Also, in the recent study, with the 5% discrepancy, 90% were downgraded and only 10% were upgraded.

Regarding the proposed changes, specifically, 5.3.1.1 (pertaining to marbling). With all due respect to the USDA Gold Standard team, our suggestion would be to incorporate some 3rd party, potentially meat science academy as part of the team to be involved in instrument approval.

Another point mentioned in the literature is the discrepancy between the USDA grader and the instrument around larger flecks of marbling, that the instrument accounts for and the grader does not. Our question is, what equates to a better or lesser eating experience? I see nothing in the literature about doing eating quality studies relative to grading discrepancies. Is there any way we can incorporate actual eating quality studies as part of the instrument approval process? At the end of the day I believe a quality eating experience is what Quality grade was designed for, and is still responsible for today.

Lastly, we would just like to reiterate that with the incorporation of instrument grading we saw vast improvements in the consistency of beef carcass grading from region to region, plant to plant, and year to year. We can only believe that instrument technology has gotten better, and will continue to improve. Hence we strongly encourage the USDA to more utilization of instrument grading with high level oversight by USDA !

Thanks for the opportunity to comment!
Kind Regards,

Jerry Wulf

--

Jerry Wulf

Wulf Cattle

Morris, MN 56267

www.wulfcattle.com

320.392.5802 - Office

320.491.1390 - Cell