



B E E F M A R K E T I N G G R O U P

February 9, 2007

Naturally Raised Marketing Claim
Agricultural Marketing Service, USDA, Room 2607-S
1400 Independence Ave., SW
Washington, D.C. 20250-0254

On behalf of the members of the Beef Marketing Group, I would like to thank AMS for allowing us the opportunity to provide comments relative to the possible ruling for the use of "Natural" as it relates to live animal production claims.

The Beef Marketing Group is an industry leading producer cooperative with members who are professional cattlemen in the business of growing, feeding and marketing beef to meet consumer needs and expectations. All of our members operations are family owned primarily in the states of Kansas, Nebraska, Oklahoma and Texas and have made a substantial commitment to our vision of implementing a vertically coordinated beef value chain.

The current definition of "Natural" has done little more than provide significant confusion in the mind of our consumer and cattle producers. Although we strongly support free enterprise and innovative business development, the degree of confusion and in some cases misleading marketing innuendo in this category demands immediate attention and the need for clarification. There is far more at stake here than need for clarification. In fact, consumer confidence in virtually all label claims may be in jeopardy.

The research we have reviewed indicates there is a growing number of consumers who are demanding beef from cattle, as well as protein from other species, that are produced with a promise of no added hormones, no antibiotics (therapeutic or sub-therapeutic) and fed no animal by products ever.

The designation of "never ever" is critical and important to understand. This is not to suggest that the use of these technologies is negative, merely not allowable under this claim. Therefore it is our position that caution should be used when considering the claim of "Naturally Raised" there may be an unintended consequence of disparagement to the commercially produced animals as not being natural. As such, any label must clearly state no antibiotics, no added hormones and no animal by-products fed. For animals to be eligible for this designation it would be our position that the use of these

products and technologies would have been prohibited and not administered through out the entire life of the animal.

As important as the definition is to us, we are even more concerned about the verification of the claim. We would support such production claims require a USDA Process Verification Program and that the USDA support verification activities to insure absolute compliance with such claims.

As stewards many thousands of acres of natural grasslands on the ranches we work with, we are keenly sensitive to the appropriate management and care of the environment in which we operate. However, including any claims relative to environmental management practices would not only be very difficult if not impossible to quantify, it would also be outside the scope of the concerns surrounding this issue. In addition animal care and handling practices are equally important but would fall out side the parameters of this issue and should be addressed separately.

Thank you for your consideration of these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Butler", with a stylized, cursive script.

John Butler, CEO
Beef Marketing Group