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**MEMORANDUM**

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**TO:** U.S.D.A., LIVESTOCK AND SEED, AGRICULTURE MARKETING SERVICE  
**FROM:** SMITHFIELD BEEF GROUP  
**SUBJECT:** NATURALLY RAISED LIVESTOCK  
**DATE:** 1/16/2007  
**CC:** NATIONAL MEAT ASSOCIATION

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The Smithfield Beef Group proposes that the Agriculture Marketing Service (AMS), in conjunction with FSIS and the FDA focus on verification rather than definition. For example, current certification programs regulated by AMS do not define what is important or of value to the consumer, but rather they verify objectively or subjectively that what is being claimed is accurate. We believe that the same should be true on the production side of the industry. We put forward that the market place should be the one to decide what is important and of value to the consumer as it relates to the raising of animals. This proposed system of process verification, either by AMS or an accredited third party, would then allow individual companies to establish and define raising claims based on consumer demand. Once these Company claims are established and found to not be misleading, the agency (AMS) or an accredited third party would, using ISO standards approve or disapprove the quality system that supports these claims.

Thank you for the opportunity to submit these comments.

Respectfully submitted,

Travis Choat