



Painted Hills Natural Beef, Inc.

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Will Homer

Operations Manager

Thursday, January 18, 2007

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

Subject: Naturally Raised Standards

First we would like to thank both the AMS and the FSIS for investing the resources into the clarification of the categories of "Natural" and "Naturally Raised". We agree that the current guidelines have left a wide undefined path for many different programs to operate under completely differing, self driven guidelines. We appreciate the opportunity to be able to take part in this rule making process.

Painted Hills Natural Beef is just moving into its tenth year of operation. Our requirements for "Natural" are the production of beef without the use of antibiotics, or growth hormones, ever. Also, animals must never be fed byproducts from other animals. We started as seven ranching families with a small goal of seeing their beef in a retail market. Today we have grown to include more than 100 different ranching families in our program.

Painted Hills Natural Beef spends a great deal of time educating consumers regarding our natural beef program. We spent over 200 hours just last year. This activity has created a very strong relationship with our end consumers. These people already believe the term "Natural" to believe the animal was raised without antibiotics or hormones and have never been fed any type of animal byproduct. To consumers it is also important the calves are raised on grass and along side their mothers just as nature had intended. The loose definition of "Minimally Processed" does not give the consumer consistency in the product labeled "Natural". Consumers want "Natural" and of course "Naturally Raised" to define the health of the animals and raising practices utilized by the ranchers.

We hope that categories will be created to help define the differences between "Natural", "Grass Fed", and "Organic". There is already a great deal of confusion between these differing programs. We reflect the voice of the consumer when we ask that the future guidelines for "Natural" and "Naturally Raised" remove all antibiotics and all growth hormones from the raising of cattle. There should never be any animal byproducts allowed in feed. We would also like to see the addition of a clear statement against the use of animal byproducts in the feeding of natural cattle.

These steps would go a long way in giving the public clear choices for their beef. The most important message we feel we can pass is that people want to understand what they are purchasing. They would like to be able to easily distinguish between the claims made on labels and thereby be able to make decisions that fit their personal values regarding the food they purchase and consume. We hope that as an industry we can help in the process to fulfill this important role.

Thank you for your consideration of these comments. We regret that inclement weather made it too difficult for us to make the trip to Seattle, the nearest hearing site. We would be available to discuss them further if contacted.