

# Nolan Ryan's

GUARANTEED TENDER MEATS

1300 Eleventh Street, Suite 310 • Huntsville, TX 77340 • (936) 436-1622 • Fax (936) 295-1747 • www.nolanryanbeef.com

*An operation of Beefmaster Cattlemen, LP*

Date: 1-24-07

To: Whom it May Concern

From: Charlie Bradbury, Chief Executive Officer

Comment on proposed revisions of All Natural definition:

1. The term "All Natural" has been defined by USDA and that definition has been in commerce for almost 20 years. Consumers have been purchasing product based on the value propositions of that definition and companies have built brands, production systems and marketing programs based on this definition. These programs are firmly established in the trade with loyal customers and distribution venues. These companies (including Beefmaster Cattlemen LP) and the consumers of these products will be severely impacted if this definition and value proposition is no longer available to them.
2. The definition that the product is minimally processed and contains no artificial ingredients does have significant meaning and value to consumers. The common sense definition is and has always been that the product is coming to the consumer just as nature made it, the product has not been altered in any way. The largest retailer in the US is currently selling large volumes of beef that is enhanced with up to 12% Sodium Phosphate solution. This product clearly does not meet this definition and the significant volume and marketing power of Wal-Mart has created a clear choice for consumers between enhanced beef or All Natural beef. Virtually 65% of the Pork in the marketplace today is also enhanced with solution, this again brings value to the All Natural definition for consumers who wish to purchase Pork that is not enhanced and has not been altered from its natural state post harvest.
3. Certain companies have sought to further define the All Natural definition to the consumer by claiming they are restricting the use of added growth hormones, antibiotics, ionophores, feeding of rendered animal fat, use of pesticides etc. These claims have assisted these companies in adding value to their products and appealing to consumers who believe for whatever reason that these products are more beneficial to them. These companies certainly have the right to make these claims but these claims all concern the manner in which the animal was raised, often from birth to harvest. These claims may in fact merit the development of a new definition for "naturally raised" but these claims should not be allowed to supplant and eliminate the current USDA defined "All Natural" since that claim does not and was never intended to have any relationship to the manner in which the animals were raised.



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4. There is no clear scientific evidence that beef or pork produced under the restrictions often associated with "Naturally Raised" management practices is in any way more healthful, safer, more nutritious, more free of harmful residues, etc than beef raised under a commodity management system. Numerous studies have compared beef from cattle raised with proper use of added growth hormones and antibiotics to beef raised without these practices, there is simply no evidence that either practice produces a more healthful product. Therefore, these are pure and simply marketing claims being advocated by companies seeking to benefit from apparent government endorsement of their practices. In a scenario where product can only be considered "All Natural" if it comes from cattle that are "Naturally Raised" then government has in fact provided that endorsement, that does not appear to be a practice that USDA should engage in.
  
5. Any definition of "Naturally Raised" will fail to meet all production needs as there are many versions of management practices designed to restrict use of added growth hormones, antibiotics used to treat sickness, antibiotics and inophores fed to livestock for the purpose of enhancing weight gain or eliminated abscesses, feeding of rendered animal fats, raptopamines etc. USDA should consider different degrees of "Naturally Raised" so as to provide opportunity for companies with variations in their approach to these practices. Certain companies including Beefmaster Cattlemen LP have established production systems that restrict the use of added growth hormones and antibiotics but do not eliminate them. There is clear evidence that these restrictions do enhance product quality. These companies and brands do not desire to claim that they have never used these substances in their production systems but they do seek to add value by claiming the restrictions they have placed on the use of these substances. Any definition of marketing claims that seeks to define the manner in which cattle are raised which denies these companies the right to claim the differentiations they make from commodity management systems is not fair to these companies and robs the consumer of choices based on purchasing power.

Thank you for your consideration

