



January 17, 2007

USDA-AMS LS No. 283-06
Naturally Raised Livestock Marketing Claim
Listening Session

SUBJECT: Naturally Raised Standards and Claims

PRESENTER: Ralph Peterson, President/COO
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INTRODUCTION:

Montana Ranch Brand markets never-ever, natural raised & processed meats; beef, pork, lamb and bison. Our business exists because of consumer demand for products that have been raised without antibiotics, growth-hormones, steroids, vegetarian fed and verified to the source of origin.

This meeting and our participation today is to discuss the basic consumer's demand for this type of product and our responsibility as a result.

Consumers believe that naturally raised meats and organically raised meats are based on the same intent.

It's a matter of consumer trust!

Due to the evolution of the term *Natural* we now have an obligation to protect the public's expectation of terminology. Bob's Natural Meat (i.e. minimally processed, no artificial ingredients) is not the same product as Montana Ranch Brand Natural Meats, Coleman Natural Meats, Meyer's Natural Meats, etc. and therefore takes advantage of the consumers' expectation of the word *natural*.

It is irresponsible to allow consumers, who want to purchase bottled water labeled *100% Pure Water* to actually be sold water that was 100% from a town named Pure. The expectation of the term pure is "*free from impurities*", not the location of the well.

This is the case with *Natural Meat*. The public's expectation is that the process & production is done in a nature-based methodology. We believe that the use of the term "*Natural*" specifically refers to the manner in which that product was produced as well as processed.

It is purposefully misleading to allow manufactures to use the term *Natural* in their processing without requiring that the product being processed to be defined as natural also.

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Our experience is that consumers believe that *Natural* means:

1. No artificial processes in the raising of the animal; the use of chemicals. Specifically antibiotics, growth-hormones, steroids, beta antagonists and ionophores, whether they are injected, fed or added to the water.
2. Animals are vegetarian-fed without the use of animal by-products.
3. By default the consumer expects these products to be source-verified and humanely handled as that is the only way to verify production claims.
4. I do not believe that our consumer is concerned about the breeding method, i.e. bulls or AI, but they will be intensely against cloning.
5. The consumer's expectation to the production claims are that they are never-ever 100% of the time and not just during the finishing phase or the last 120 days.
6. Consumers should not be required to understand the different tiers of antibiotic use. Naturally raised should mean no antibiotics *ever*, whether drank, fed or injected.
7. NO artificial handling process, as in crated calves, with no access to grass, ever
8. Slaughter and processing should remain "minimally processed, no artificial ingredients (no water injections, marinating, etc.).
9. No product should be allowed to be labeled as *natural* processed that was not naturally raised.

In short, we should not make the consumer have to determine what the meaning of "is" is.

Integrity is Integrity. Either our products have it or they don't! Our consumers deserve very clear choices. We respectfully urge quick action to be taken to clarify these issues.

Respectfully,

Ralph Peterson
Present/COO
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