



January 18, 2007

VIA ELECTRONIC MAIL

Mr. Martin O'Connor
Chief
Standards, Analysis, and Technology Branch
Livestock and Seed Program
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

RE: Marketing Claim for Naturally Raised Livestock

Dear Mr. O'Connor:

On behalf of Meat and Livestock Australia ("MLA") I am pleased to submit these comments regarding a potential standard to define the term "naturally raised" and its use in marketing claims. The Australian beef and sheepmeat industries are interested in the outcome of the U.S. industry debate and AMS's efforts in this regard.

MLA is a producer-owned company with 40,000 livestock producer-members. It provides services to Australian livestock producers, processors, exporters, foodservice operators, and retailers and represents many producer-members who export beef and lamb to the United States. The majority of Australian lamb and beef are raised under conditions that most consumers would consider "natural."

There are many animal production practices which could be defined as a natural way to raise livestock. A look at the current marketplace demonstrates the emergence of a number of brands incorporating "naturally raised" claims which incorporate single or multiple claims about how the livestock was raised. Each of the practices for which such a claim is made, either on an individual basis or in combination with one or more other natural practices, may appeal to different groups of consumers. Therefore, if AMS develops a voluntary standard for "naturally raised" livestock, MLA believes that the standard should be sufficiently flexible to enable the marketing of either a single positive attribute or a range of positive attributes.

MLA understands there may be interested parties who believe there should be a single, all-encompassing, and highly restrictive approach to identifying a product to consumers as derived from "naturally raised" livestock. This is the "conception to

consumption” model. MLA believes there is room for such an all-encompassing approach, but only as part of a broader spectrum of definitions for what constitutes “naturally raised” livestock. MLA urges AMS to recognize the necessity of such a spectrum and to use this approach in establishing appropriate standards.

USDA’s standards for organic foods should not be the model for the “naturally raised” standards. MLA has an interest in the organic segment because its membership includes accredited organic livestock producers that supply the United States market. If AMS proceeds with a new voluntary standard for “naturally raised” livestock, the new category must be clearly distinguishable from the existing organic standard to minimize confusion amongst consumers and to justify the cost of creating a new voluntary standard.

MLA understands that FSIS is separately considering a definition for the term “natural” and the conditions under which a voluntary claim of “natural” can be used on meat and poultry product labels. MLA will also file comments with FSIS regarding the definition and wishes to note in its comments to both AMS and FSIS that these separate actions involve a number of overlapping issues that are closely related and should be considered holistically, if possible.

AMS’s proposed standard should be flexible enough to allow a range of livestock production practices that consumers consider both positive and natural and should not replicate the USDA standards for organic foods. Such flexibility would not only recognize a variety of consumer interests and honor consumer choice, but potentially would also allow consumers to benefit more quickly from developments in the industry.

Sincerely,

A handwritten signature in black ink, appearing to read "M. A. Gorman". The signature is fluid and cursive, with a period at the end.

Michelle Gorman
Regional Manager, North America