



Colorado's Best Beef Company

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Regarding possible changes to "All Natural" label for beef

The current labeling requirements for "natural beef" as simply being "minimally processed and no added ingredients", disregards the spirit and intention to separate a product from a commodity. Those of us who try to offer a different product commonly known as "natural beef" have found the marketplace to be watered down by products claiming to be "All Natural" because of the wide latitude that "minimally processed and no added ingredients" encompasses."

Minimally processed and no added ingredients" refers more to the processing than to the production. As a producer, we want some separation at the production level. Specifically, because of the label on the beef we raise, we want the world to know that our cattle receive no steroids or hormone implants and are never given non-therapeutic antibiotics (feed antibiotics). Without any ability to separate our product at the production level, makes it very difficult to financially compete with "commodity" products that have a significant cost of gain advantage to the product that we are raising. We certainly feel that the label designation "All Natural" should give producers credit for the time, trouble and money it takes to differentiate our product from that of a "commodity".

Regarding the processing of All Natural beef, how can the "Rinse and Chill" method be considered even under the current definition of All Natural beef? When the water and solution are pumped through the carcass, isn't that an "added ingredient as well as additionally processed and not minimally processed"?

Our customers have three main concerns and place equal importance on: no steroid or hormone use, no feed antibiotics and the humane treatment of our cattle. Additionally, our customers are concerned with the responsible use of the land, as are we. They do not have a problem with therapeutic use of antibiotics. As a small producer we are concerned that an "All Natural" label that embraces a "never-ever" position concerning antibiotic use, would be too restrictive, too hard to police, and cause too many animals to fall out of a program simply because we were giving them the best care possible. As a small producer, this would cause a financial burden that may not be overcome.

One could make an argument that the animal's health could be put at risk if we were to place a greater importance on never treating an animal. By not administering to animals in a responsible manner and hoping that they will get well on their own, just to avoid them falling out of the program, is irresponsible as a herdsman. Rather, wouldn't it be better to have the ability to treat suspected problems aggressively to alleviate their symptoms, avoid disease and minimize/eliminate the animal's suffering?

We feel that the current definition of “all natural beef” allows commodity beef to be labeled as –all natural, thereby giving an unfair advantage relating to cost of production, but more importantly is deceptive to the consumer. The industry must be true to the consumer. At Colorado’s Best Beef, we say what we do, and we do what we say.

We feel a great deal of caution should be exercised before any implementation of rules or guidelines is used as requirement for the labeling process. Too often, these well meaning inclusions end up morphing into something besides what was intended and provide an avenue for further miss-use and the enemies of our industry to enter our management and decision making process.

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