

What is “Natural” Meat?
By Bill Niman and Nicolette Hahn Niman
Comments to USDA
Denver, Colorado, January 16, 2007

Summary of Comments

What constitutes “natural” meat is becoming an increasingly important question as more and more consumers seek it out. As full-time cattle ranchers and natural meat purveyors, we consider it critical that USDA establish a meaningful and credible definition of “natural” for meat labels. The current definition, (which amounts to “minimally processed” and fails to consider *anything* about the way the animal was raised), is clearly inadequate. We urge that to be credible USDA’s definition must relate to the manner in which the livestock was raised and should also relate to consumers’ expectations. Anything less will ultimately further erode consumer confidence in the meat industry.

Specifically, we urge USDA to set its definition of “natural” using the following criteria:

1. “Natural meat” can only come from livestock *raised* naturally.
2. Standards should be established for what constitutes “naturally raised” livestock, comparable to USDA organic standards. These would include, among other things: a) requirements for natural livestock feeds, 2) limitations on chemical and pharmaceutical substances administered to animals, and c) requirements for natural livestock husbandry methods; and
3. Consumers’ expectations for “natural” meat should be taken into account.

Our Backgrounds and Experiences

Bill Niman

My life as a livestock farmer began more than 35 years ago, when my late wife and I started raising chickens, goats, and pigs in Northern California. In the decades that followed, we increased the size of our pig herd and started selling pork to family and neighbors. We added cattle, too, and began supplying beef to restaurants and natural foods stores. I was involved in every aspect of the meat production – from breeding the livestock, to slaughter and butchering, to delivering the meat to restaurants’ backdoors.

Eventually, we stopped raising pigs and focused on cattle (because that’s what does best where we live), which is what I still raise today. But we came to know other farmers who believed in raising pigs and sheep using natural, traditional methods. One farm at a time, Niman Ranch grew into what it is today: a network of more than 600 professional farmers and ranchers who all raise their animals according to Niman Ranch’s standards.

I started my own farm and this network of farmers with a simple idea: Animals should be raised as naturally as possible. I didn’t need to look up the word “natural” in the dictionary to know what it meant; I just used common sense. To me, “natural” animal

husbandry has always meant minimizing drugs and other chemicals, never using hormones, and feeding only natural feeds. But “natural” also means more. It means that animals lead lives connected to how they’d live in nature; they are given the opportunity to express their natural behaviors. In other words, pigs should be allowed to be pigs, cattle to be cattle, and sheep to be sheep. In my view, feeding and husbandry practices that thwart an animal’s basic instincts cannot be part of a farm raising animals for “natural” meat.

Through my own experiences raising animals and hundreds of visits to all types of other farms over the past three decades, I have learned a lot about animals and how to raise them. What I’ve learned over the years has reinforced my belief in the importance in raising animals as naturally as possible.

I’ve been dismayed to witness the rise of methods that rely to a great extent on machines, buildings, liquefied manure systems, and automation and that keep livestock in ways that are wholly unconnected with nature, especially confinement hog production and confinement dairies.

Specifically consider pigs for a moment. Pigs are highly intelligent and sensitive creatures. It’s widely recognized that they’re as clever as dogs, maybe more so. I’ve known of pigs who learned how to open gates. In natural settings, pigs are attentive and nurturing mothers who take great care in preparing for the arrival of their newborns. I’ve observed plenty of sows getting ready to give birth. Given the opportunity, they spend hours -- even days -- making ready a special spot for themselves and their piglets. If a sow has access to sticks, branches, or tall grasses, she will spend that time building an elaborate nest for her young. But of course, in industrial-style swine operations, none of this is possible. Confinement settings frustrate the sows’ very nature, leaving them unable even to turn around or stretch their limbs, much less build a nest.

For more than a decade Niman Ranch has consulted with the independent non-profit organization Animal Welfare Institute (AWI). Over ten years ago, we adopted the AWI Pig Husbandry Protocols, which every one of our pig farmers follows. Our standards have always required that pigs be given access to the outdoors or large, deeply-bedded pens with plenty of room to move about. Our pigs exercise, breathe fresh air, interact with each other and with their young, root, play, and build nests when they’re ready to give birth. We’ve never allowed pigs to be kept in buildings where they’re standing over pools of liquid manure and we’ve never allowed any form of crates on our pig farms. In my view, these are the sorts of standards that are essential to “naturally” produced pork.

All of this makes for happier pigs, sparing them from needless suffering. But it also makes for better business practice and happier customers. In my three decades in the meat industry, I’ve become absolutely convinced that you cannot produce good meat without high animal welfare standards. I’ve always believed that if you treat an animal like a sponge, it’ll taste like a sponge.

Conversely, I believe that providing an animal a good life and a swift, painless end ensure the best tasting and healthiest meat. A growing recognition of the connection between humane slaughter practices and good, safe meat has led many of the nation’s meat packers to build slaughterhouses focused on the animal’s subjective experience. It makes complete sense to do the same for the farm, particularly for meat that is labeled “natural.”

Over the past three decades, I've had conversations with hundreds, (perhaps thousands), of the consumers of our meat. In these conversations I've learned that people have images in their minds' eyes about what it means to farm naturally. Obviously, there is some diversity of opinion. But certain general themes consistently emerge: 1) animals should be living outdoors as much as possible; 2) animals should be allowed to interact normally with each other; 3) animals should be given natural feeds, and 4) animals should not be administered drugs unless they are sick. Likewise, certain things clearly violate the general consumer's perception of natural farming. Examples would include, keeping animals continually confined, adding drugs and other man made compounds to their regular rations, and administering drugs or hormones to stimulate growth.

Nicolette Hahn Niman

For the past seven years, I have worked exclusively on issues relating to the livestock and poultry industries. Much of that time has been spent researching and writing about animal farming and gathering hundreds of studies from around the world. I worked closely with my husband in the research and writing of *The Niman Ranch Cookbook* (Ten Speed Press, 2005), which has a lengthy narrative about natural farming and ranching. In the last four years, I have also worked more than half-time on our own cattle ranch in Bolinas, California. Prior to that, I worked for nine years as a lawyer, the last two of which I was the Senior Attorney for the environmental organization Waterkeeper Alliance. In my work as a lawyer, I've been involved in litigation with the meat industry and numerous federal rulemaking processes.

As a rancher, lawyer and advocate on issues surrounding livestock, I am keenly interested in the use of the word "natural" on meat labels. I find it baffling that USDA has a detailed and demanding set of livestock husbandry standards for use of the word "organic" but essentially none for use of the word "natural." As a lawyer, I can see no meaningful difference between these two claims and I can see no rationale for the extensive set of USDA standards in one case and a complete absence of standards in the other case.

Even more importantly, most consumers would be baffled by this too. From my interactions with the public in the years I've worked on livestock concerns, it is clear to me that people buying meat labeled "natural" assume that the government is ensuring that such meat is naturally raised. They believe that standards for "natural" meat already exist. Many consumers, chefs and retailers would be upset to learn that there is no requirement that meat labeled "natural" be raised in any particular way.

I also believe that a consensus exists in the American public about what does and, equally importantly, what does *not* constitute "natural" farming. I urge USDA to use the public's perception of "natural" to serve as the basis for its own definition. And I don't think it should take a decade of hearings and other processes to establish what that consensus is.

Our Specific Recommendations

I. "Natural meat" can only come from livestock *raised* naturally.

This is simply common sense. Just as organic meat and poultry can only come from organically raised animals, "natural meat" can only come from naturally raised

animals. Countless studies have shown that livestock husbandry affects the meat. To name just a couple of examples, dozens of studies have shown a link between operations that use antibiotics sub-therapeutically and antibiotic-resistant bacteria. A 2001 FDA study found significant rates of antibiotic resistant bacteria on beef and chicken from such operations. For precisely this reason (along with concerns over the resistant bacteria entering water and air), the European Union disallows sub-therapeutic antibiotics in livestock. The EU also disallows the feeding of arsenic because of evidence of arsenic residues in the meat. These facts illustrate why consumers have a legitimate interest in being able to identify meat that comes from animals raised “naturally.”

II. Standards should be established for what constitutes “naturally raised” livestock.

These could be comparable to USDA organic standards and would include criteria for, among other things: a) definitions of and requirements for natural livestock feeds, b) limitations on chemical and pharmaceutical substances administered to animals, and c) definitions of and requirements for natural livestock husbandry methods. Natural feeds should be required because it has long been known that residues of what’s fed to animals can end up in their flesh. This is why the feeding of certain substances is banned altogether. Similarly, drugs and other chemicals administered to animals can end up in their flesh. As with feeding, certain substances are banned altogether and withdrawal periods are required because drugs and chemicals can end up in the meat. Natural animal husbandry methods should be defined and required because failing to do so would violate consumers’ understanding of what they’re purchasing. Husbandry methods that thwart an animal’s basic instincts should not be allowed. For example, any crating of animals should be disallowed under a “natural” label. Consideration of the way the animals live should be at the core of the “natural” meat standards.

III. Consumers’ expectations for “natural” meat should be taken into account.

As stated above, in our interactions with consumers, it has become clear to us that people buying meat labeled “natural” believe they are buying a product that meets specified standards for the way the animals were raised. The highly public process for creating USDA organic standards has probably strengthened this perception. Because the public already holds certain beliefs about what is “natural” and what is not, allowing use of a label that conflicts with these generally held beliefs will necessarily cause confusion and misunderstanding among consumers. Ultimately, this will lead to further loss of consumer confidence in the meat industry, something that is bad for everyone involved in producing meat.

To give a specific example of this point, consider beef labeled “natural.” We are quite certain that many consumers would be shocked to learn that some “natural beef” brands feed their animals urea, a by-product of fertilizer production from petroleum and natural gas. Such a substance runs directly counter to their expectations of what it means to raise cattle “naturally.” In fact, based on specific conversations we’ve had

with people over the years, we believe some people seeking “natural” meat would be unwilling to eat meat from animals fed urea. Another example of use of the word “natural” running contrary to a consumer’s expectations is “natural” Holstein beef programs. We are confident that many (if not most) consumers if they were made aware of the specifics of how such beef is produced, would be outraged by this use of the term “natural.” These programs are exclusively sourced from male dairy cattle that would be lucky to have three days of their mother’s milk before living out their lives in a CAFO, never to have mother’s milk again nor eat a blade of grass.

We believe that there is an implied contract between purveyors of natural meats and consumers. Meat purveyors using the term “natural” must live up to the purchaser’s foreseeable expectations of how animals used for “natural meat” spend their lives and what they eat.

Conclusion

Mad cow disease, E-coli, pollution spills, and antibiotic resistance, among many other issues, have shaken the confidence of United States’ meat consumers. For livestock farmers and ranchers and the meat industry as a whole to continue to thrive, it is essential that consumer confidence in meat’s wholesomeness and safety be restored. This will be best achieved when meat labels make claims that do not mislead the public. For this reason, we urge USDA to establish meaningful standards for “natural” meat that relate to a reasonable consumer’s understanding of the word “natural.”