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USDA-AMS
Naturally Raised Livestock Marketing Claims
Listening Session – Denver, Colorado

Harris Ranch Beef Company is one of five business entities operated by Harris Farms Inc., a family-owned, functionally-integrated livestock and farming operation located in the San Joaquin Valley of California. Harris Ranch Beef Company is a leader in branded and value-added beef production in the U.S.

The USDA Agricultural Marketing Service (AMS) is to be commended for its attempt to define “Natural” as it relates to live animal production claims. It is appropriate that these “Naturally Raised” definitions are considered separate from the meat processing criteria codified by its sister agency, the Food Safety Inspection Service (FSIS).

Consumers have demonstrated a desire and willingness to purchase beef and beef products generated from cattle that are produced under certain production scenarios, i.e., raised without the use of antibiotics, produced without added hormones, or cattle not fed animal by-products (often referred to as “all vegetarian diet”). These production criteria are commonly referred to as “credence” attributes. While it is true that sales of “Natural” beef have increased significantly in recent years, it is equally true that the total of these sales represent a small niche market, and therefore, caution is warranted not to disparage beef produced using common production practices.

Clear definitions of terms used in making “Naturally Raised” claims are long overdue. Not only is the consumer confused, but those companies marketing “natural” beef programs are often frustrated with the inconsistency regarding which products can or cannot be used when making “Naturally Raised” claims. To provide consistency, and effectively level the playing field, the onus should fall on USDA to identify those products that can or cannot be used and/or fed at the production level in making a “Naturally Raised” marketing claim, especially as it relates to the use of antibiotics and added hormones.

While it is important to clearly define production practices associated with making a “Naturally Raised” claim, industry should be provided latitude to choose the specific production practice(s) tied to such a marketing claim. For example, if “Naturally Raised”

were tied to a minimum threshold that included **all** of the following: “no antibiotics-ever”; “no added hormones-ever”; and, “no animal by-products fed”, then the majority of all Holstein cattle fed in the U.S. would be precluded from “Naturally Raised” programs. However, if a company has established a consumer market for “Naturally Raised” beef that only addresses the credence attribute “no added hormones-ever”, then such a claim should be allowed, provided it is clearly stated on the label.

The term “All Vegetarian Diet” is false and misleading to the consumer, and would disallow the use of many commonly used feedstuffs. The more appropriate term should be “No animal-byproducts fed” (e.g., poultry litter, tallow, feather meal, etc.). The term should in no way preclude the use of feedstuffs that provide a source of protein (urea), extend shelf life (vitamin E), provide pre-harvest food safety benefits (lactobacillus acidophilus); or involve the use of other plant-based co-products (e.g., CCDS, DDG from ethanol production).

Caution is warranted in including animal handling and/or animal care standards to a “Naturally Raised” claim. Beef cattle production practices vary considerably and are in large part dependent upon geography, climate, available shelter/feedstuffs/labor, etc. Attempting to codify animal care and husbandry practices will prove exceedingly difficult as these criteria are inherently subjective in nature. Similar difficulties would also be associated with attempts to codify “sustainable-raised” criteria.

Finally, credible third-party verification should be a minimal requirement for companies wanting to utilize a “Naturally Raised” marketing claim. It is indeed unfortunate, but self-certification (via producer affidavits) should no longer be an accepted form of verification activities. In its place, the President Ronald Reagan inspired phrase, “Trust but verify”, should be employed. As “Naturally Raised” production claims are linked to Process Verification Programs (PVP), the USDA should employ verification activities similar to those utilized within the organic certification program. The simple fact of the matter is, the costs of program activities requiring USDA oversight (BEV, QSA, PVP) are burdensome to industry. All efforts should be made to minimize the costs associated with verification activities, by allowing market driven competition among USDA approved third-party certification companies.