



January 17, 2007

Naturally Raised Marketing Claim
U.S. Department of Agriculture — Agricultural Marketing Service
Room 2607-S
1400 Independence Ave., S.W.
Washington, DC 20250-0254

**Verbal and written comments submitted by Marie Belew Wheatley, President and CEO,
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USDA Agricultural Marketing Service Listening Session
Hyatt Regency Tech Center
Denver, CO

The American Humane Association observes its 130th anniversary this year as the oldest and largest national organization dedicated to the mission of protecting the welfare of both animals and children. Founded in 1877, the organization's beginnings stemmed from the need to address inhumane treatment of workhorses. In 1879, American Humane began inspecting stockyards, rail cars and slaughterhouses in an effort to improve the welfare of farm animals. In 1916, at the request of the U.S. Secretary of War, American Humane originated Red Star Animal Relief to protect horses used during World War I. Over 13 decades, American Humane has evolved and grown to encompass an array of services to protect and enhance the well being of those without voices – animals and children. Among its many current programs is Free Farmed Certified, a monitoring and certification program that allows agricultural food producers who raise animals to promote and label their products as humanely raised and processed according to American Humane Association standards. Free Farmed is the first and one of the most widely recognized farm animal welfare programs in existence in America.

American Humane is agriculture friendly and a reasonable, thoughtful organization when it comes to humane treatment of animals raised for food. In addition to our role in certifying humane treatment of food animals, we also seek to educate consumers on food terminology and how to distinguish between true humane treatment and misleading marketing jargon.

American Humane supports the development of reasonable and understandable (consumer friendly) standards and rules for the marketing term "naturally raised." We applaud the fact that the Agricultural Marketing Service seeks to develop such a standard that will better define the term and specify protocols farmers and ranchers must follow to claim that the livestock and poultry they produce are naturally raised.

Further, we believe those terms and labeling can and should exist side-by-side with legitimate third-party certifications for humane treatment of animals, such as Free Farmed.

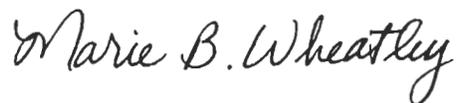
We believe any claim or labeling of "naturally raised" should require the following:

- No synthetic growth promotants or synthetic additives were ever used during the life of the animal. Also, no antibiotics were used during the life of the animal except and only if needed to treat an ill animal for a period of time. As in the Free Farmed program, if an animal is treated with antibiotics, they would not qualify for the “naturally raised” claim.
- No animal-derived products were ever contained in feed fed to these animals. Instead, such animals have been raised on a vegetarian diet. (For animal health reasons only, we believe that this vegetarian standard may allow very temporary, short-term supplements of protein such as milk or egg products to weaned animals.)
- Such animals have lived under humane conditions and have been raised with careful regard to their welfare. Legitimate third-party certifications, such as American Humane’s Free Farmed, may be used to ensure that the humane standard is met.
- Additionally, for non-marinated raw products, it should mean no added water or ingredients. For marinated or cooked products, it should mean it has been made with only “natural ingredients,” in an acceptable manner, as currently classified by the USDA.

As you can tell from our comments, we believe the term “naturally raised” should be construed to include both production (the raising and welfare of the animals themselves), as well as the eventual processing of the animal into food products.

Finally, American Humane offers itself as a resource to the Agricultural Marketing Service in further developing the “naturally raised” livestock standard into one that is consistent, meaningful and acceptable to food producers, consumers and to those, like American Humane, who are concerned and active about the issue of animal welfare.

Sincerely,



Marie Belew Wheatley
President & CEO
American Humane Association