

# **“Naturally Raised & Processed”**

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**Denver, CO**

Good Afternoon. My name is Mack H. Graves and I serve as CEO of Western Grasslands, Inc. doing business as Panorama Meats, Inc. of Vina, CA. Our company markets both natural and organic grass-fed beef from our base in California to mainstream conventional retailers, specialty product or natural food retailers and food service operators on the West Coast and across the US. We have 43 rancher/producers supplying us cattle raised to protocols we have developed that far exceed the current definition of natural.



As I stated in my comments during the AMS December 11, 2006 listening session and the FSIS listening session December 12, 2006 regarding a natural label, the vagueness of the current “natural” definition – “minimally processed and no artificial ingredients” – first established some 24 years ago, has sown seeds of consumer confusion. It has encouraged clever marketers to trumpet the word “natural” on packages of their meat and poultry, even though such meat may have come from animals that were hardly “naturally raised.” Such confusion has lasted far too long and a more meaningful definition of “natural” is necessary.

Panorama is proposing that both FSIS and AMS consider the term “naturally raised and processed” as the complete definition of natural on meat and poultry labels. This would eliminate any confusion on anyone’s part, including those who raise animals through to those who consume meat and poultry from those animals. The term “naturally raised and processed” would mean:

1. Animals raised with:
  - a. No added hormones
  - b. No antibiotics either fed or injected including ionophores
  - c. No animal byproducts in the feed
  - d. Individual animal identification from birth through processing
  - e. Humane treatment
  - f. Environmental stewardship
  - g. Minimal processing
  - h. No artificial ingredients during processing
2. Meat and Poultry processed:
  - a. With no added artificial ingredients
  - b. Minimal processing

How do you verify “Naturally Raised and Processed”? Currently, for those who would make “natural” claims, e.g. raised without antibiotics, etc., it is a self-certification process. This system can be formalized, with strict rules for qualification. All participants in the production chain – producers, processors and marketers – would have to affirm that they abide by the naturally raised and processed definition through sworn affidavits. Such affidavits would be

part of the Federal rule for “naturally raised and processed,” and misuse of them would be punishable.

### **Panorama’s Question**

Again, we ask the question, “How do you take meat or poultry from animals raised “unnaturally” with growth stimulants, antibiotics, questionable humane practices and poor environmental stewardship and make the meat “natural” by *minimally processing it with no artificial ingredients*? Separating livestock raising from processing and marketing in developing a definition for “natural” will only add to the consumer confusion that currently surrounds the term. However, “Naturally Raised and Processed,” properly defined and enforced, would eliminate any confusion.

Too many live animal producers, meat and poultry processors and marketers and, most importantly, consumers, will rely on a thorough and complete definition of “natural” for it to be partially defined. FSIS and AMS must work in concert on the definition of “natural” for the greater consumer good, not to mention food safety. “Naturally Raised and Processed” encompasses both agencies’ oversight purview. If we can have different parts of the USDA cooperate on the organic definition, then we can expect them to work together on the “Naturally Raised and Processed” definition as well.

In conclusion, any definition of “natural” must stretch from the livestock’s lifestyle to their diet to the processing and marketing of meat and poultry. We are proposing that “Naturally Raised and Processed” be the label declaration for animals raised naturally and meat and poultry processed naturally.

Thank you.

