NATIONAL MEAT ASSOCIATION
Agricultural Marketing Service
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We appreciate the opportunity to present our views on this issue at today's Listening Session.

The focus of AMS is to establish a standard for the term "Naturally Raised" as applied to the handling and feeding of livestock approaching harvest. A concurrent effort by FSIS is the voluntary claim "natural" as it is applied to how meat and meat products labels reflect the ingredients and processing. Further, in response to a petition from a major processor, FSIS is suggesting that rather than its traditional policy development, the issue be developed through formal rulemaking.

Today's listening session is about the AMS term, but it is NMA's strong belief that the two agencies must collaborate their efforts to assure consumers that the term "natural" when applied to meat or poultry products is consistent throughout the production and processing chain.

To this end, NMA does not believe it is in the public interest to stray from longstanding practice and develop the policy through rulemaking. Rather, it should continue to be developed as a matter of policy by the agencies in a very transparent manner, but short of formal rulemaking. Further, these two USDA agencies must also consult with the Food & Drug Administration to ensure that their policy is consistent with that agency's policy for all other ingredients.

Quite frankly, formal rulemaking for this issue would establish a bad precedent for the future, and would unnecessarily delay the ability of all three agencies to serve the public interest with clear and unequivocal policy parameters in a timely manner.

NMA would support a more transparent process for policy development, so that the industry and consumer constituency would be informed when the agency is considering making changes in policy, and would provide for public input. However, such notice should fall short of formal rulemaking, and would allow for changes that are technologically and scientifically-supported in a timely manner.

From the live animal and/or live bird perception, the term "natural" means that the animal has never had antibiotics, hormones, any other synthetic substance including growth modulators, and only been raised on vegetable-source feed. Further, the husbandry practices meet published animal welfare standards. The term may be carried forward as the livestock are harvested and processed under the authority of FSIS.

Livestock and poultry qualifying for the term "natural" that are harvested then enter the jurisdictional oversight of the Food Safety & Inspection Service. That agency has just announced an extension of time to receive comments on the issues it raised in its December Notice. Those issues include what is considered "minimal processing." In a submission to the public meeting that FSIS held on this subject in December, NMA provided a formal written statement, and a copy is filed herewith for the record. Quite frankly, it is essential that AMS and FSIS collaborate on this policy, since they are inter-dependent and the consumer will only derive the benefit of full understanding of the term "natural" by consistent, inter-dependent policy.

In conclusion, NMA plans to file formal comments on the use of the term "natural" as applied to poultry and livestock and the products therefrom with both AMS and FSIS in due course. We recommend strongly that the collaboration between AMS and FSIS begin today, that public discussion and policy development, short of rulemaking, be done in an open, transparent and collaborative manner, with joint comment deadlines, and all comments submitted to each agency be shared with the other.

Finally, we wholeheartedly agree with those that suggest that whenever a producer or a packer or a processor claims that its product is "natural" that claim should only be permitted if there is a verification available to show that it meets the standard. Such verification service may be available through the Ag Marketing Service or a private entity that has met appropriate standards to qualify for the public trust.

Thank you for your consideration of our views.