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Date: January 17th, 2007

Subject: Naturally Raised Marketing Claim

To: U.S. Department of Agriculture—Agricultural Marketing Service
Listening Session
Hyatt Regency Tech Center
7800 East Tufts Ave
Denver, Co, 80237

Submitted electronically to naturallyraised@usda.gov

From: Chad Maxwell
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To Whom It May Concern:

On behalf of Natural Farrowing System, we would like to commend USDA on attempting to create a definition for a Naturally Raised Livestock and Meat Marketing Claim. We believe that it is extremely important for USDA to establish a set of "Natural" definitions, specie specific, to meet the consumer's demand of knowing, how their product is being raised, before the term "natural" is grayed beyond having any meaning.

The Natural Farrowing System® (NFS) is a patented, standardized alternative to confinement hog production, with producers raising pigs in seven different states. At NFS, we are dedicated to bringing hog production back to the family farm in a Low Cost, Low Labor, and Odor Free Environment.

The "natural" in the Natural Farrowing System®, refers to allowing the animal to display its "natural" instincts and behaviors, as opposed to the product that is being produced, allowing you to choose between the conventional or "niche" markets.

As we are passionate about allowing our animals to display their natural instincts, we too urge you to set the benchmarks for allowing a "naturally raised" claim to be dependent upon criteria that allow the animals to display their natural instincts. Obviously, any claim statement must cover birth to plate.



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Since we are in the hog business, we will specifically reference the baseline natural instincts that we believe should be considered in defining “natural” hog production. These include the gilt/sows natural behavior and instincts to:

- isolate herself from the herd 24 hours before farrowing.
- seek a warm, dry area to root in and nest in.
- begin nest building 12 to 15 hours before farrowing.
- have the freedom of movement.
- vocalize with and nurse pigs immediately after farrowing.
- seek to defecate and urinate away from her nest.
- find her own nest and piglets based on scent.
- keep her piglets isolated from the herd for 10-14 days.
 - after 10-14 days the gilt wants her piglets to follow her to integrate with the rest of the herd.
- at 5-6 weeks the gilt begins to move away from piglets and start a gradual weaning process by limiting nursing time which encourages the piglets to begin consuming more dry feed.

Furthermore, the use of farrowing and gestation crates must never be allowed when using the claim of “natural,” because, while these tools may have positive production attributes, they work contradictory to the animals “natural” instincts described above.

In addition to meeting these “natural” instincts, we believe that it is important that the facility that is used to raise such animals will allow for:

- natural sunlight
- natural air ventilation
- deep bedding or access to outdoors
- any facility that is supporting farrowing to be a free stall, allowing the gilt/sow to turn around and move in or out freely.

Finally, you must address the use of antibiotics, worming, vaccines, teeth clipping, tail docking and feed.

Antibiotics – While we do not believe that a single antibiotic shot should make an animal “unnatural,” we see the opportunity for misuse to be too great to allow for any antibiotic use in the marketed product. Thus, we stand behind the never-ever antibiotic philosophy, with sick animals treated and identified, but not marketed as “natural.”

Worming and Vaccines – We believe that producers should be granted full access to wormers and vaccines to ensure their herd health. This is not only important for animal welfare, but for industry wide disease prevention.



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Teeth clipping – Should not be a routine practice, but it should be allowed. This is an issue that should be dealt with on the farm, and left up to the producer’s discretion. You may want to consider changing “clipping” to “filing,” as performed in the EU.

Tail Docking – Should not be allowed. The practice of tail biting is most often indicative of poor living conditions (either over crowding or poor nutrition).

Feed – While we all know that pigs are omnivores, we believe that the general public expects the animals to be fed an all vegetarian diet, free of meat, blood, bone and feather meal, and any claim of “natural” should not allow for the feeding of said products.

In closing, we would like to thank you for your time and consideration. We would also like to extend our services, should you want to learn more about our definition of “Natural.”

Sincerely,

Chad Maxwell
Managing Director
Natural Farrowing System, LLC