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Naturally Raised Marketing Claim
Agricultural Marketing Service
USDA, Room 2607-S
1400 Independence Ave., SW
Washington, DC 20250-0254

Via Fax: (202) 720-1112
Via e-mail: naturallyraised@usda.gov

To Whom It May Concern:

Pursuant to the Agricultural Marketing Services' November 27, 2006, notice on its website, the Center for Food Safety (CFS) submits the following information and comments concerning the development of a voluntary standard to address production practices with the term "naturally raised" livestock. See USDA Announces Listening Sessions on Marketing Claim for Naturally Raised Livestock, *available at* <http://www.ams.usda.gov/news/283-06.htm>. CFS is a non-profit, membership organization that works to protect human health and the environment by curbing the proliferation of harmful food production technologies and by promoting organic and other forms of sustainable agriculture. See generally <http://www.centerforfoodsafety.org>.

In the past few years, dozens of new eco-labels have flooded the market, most without verifiable standards or third-party certification. The development of a "naturally raised" labeling claim will only add to existing consumer confusion in the marketplace. CFS also does not believe that the development of voluntary livestock standards allowing the use of the term "naturally raised" are necessary or useful to consumers. The existing standards governing the production of organic livestock already accurately and best reflect the qualities consumers associate with the "natural" raising of livestock.

For a number of reasons, the Organic Foods Production Act (OFPA), the National Organic Program regulations, and the National Organic Standards Board recommendations combine to provide production standards for livestock that are most equivalent to the "natural raising" of livestock. First, livestock raised to be marketed under the organic label cannot be administered hormones or antibiotics. See e.g. 7 U.S.C. §6509(c)(3).

Second, the OFPA specifically created production systems based upon an allowance of natural substances and a prohibition on synthetic substances. 7 U.S.C. § 6517 (National List). In applying this dichotomy to livestock production system, organic production directs livestock systems to be as “natural” as possible.

Third, the National Organic Program regulations contain other important components critical to consumer expectations of “natural raising.” The animals are required to be fed 100% organic feeds - i.e. feeds grown without the use of synthetic pesticides, fertilizers, or genetic engineering. See 7 C.F.R. § 205.237. Livestock producers must also establish and maintain living conditions for the animals that accommodate “the health and natural behavior” of the animal and include access to the outdoors, pasture, and shelter designed for “natural maintenance, comfort behaviors, and opportunity to exercise.” See 7 C.F.R. §205.270.

CFS would only support a voluntary “naturally raised” labeling claim if the standards associated with the claim were to exceed that of current organic practices. To date, there is no suggestion that this will be the case. Absent such an “organic and beyond” standard, the allowance of a “naturally raised” label claim will only mislead consumers and add a premium to products that are produced under a standard that pales in comparison to the “naturalness” of the existing organic standards.

Respectfully submitted,



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Legal Director