

COLEMAN NATURAL FOODS

December 11, 2006
USDA-AMS LS No. 283-06
Naturally Raised Livestock Marketing Claim
Listening Session

Subject: Naturally Raised Standards and Claims

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Introduction:

As a fifth generation Colorado ranching family member I'm honored to be here today to comment on the necessity and value of establishing standards and claims for the term *naturally raised*. Doing so will benefit livestock producers and consumers alike.

Background:

Since our early beginnings in 1875 until the post WWII years when in fact all livestock raising practices were natural, ranch income was derived from calves being sold based on the commodity markets. As production practices intensified and cheap food policy was supported with the advent and use of growth hormones, and sub-therapeutic antibiotics in production, we were facing economic disaster if we too did not abandon our century-old raising practices.

In the late 70's, one night at the dinner table my sister-in-law, a student at the University of Colorado, made a comment that many of her friends were looking for beef that came from cattle raised old fashioned way, without the use of antibiotics or growth hormones. Dad said a chill ran up his spine; an idea was born.

Within a year we had fat cattle raised from birth without the use of antibiotics or added growth hormones and several carcasses hanging in a cooler, segregated by Dad's handmade "natural" stamp. After a direct, but friendly, confrontation with the plant's USDA inspector he found the term *natural* did not have a USDA definition or standard and therefore could not be used.

The arduous task of writing protocols specifying how livestock are raised, and an audit trail and tracking system to verify premises and source of each animal from birth was submitted to support his raising practices and claim. After this two year process Dad's vision became a reality when, in 1981, the USDA approved a *natural* label, as it pertained to natural raising processes.

The ability to offer an alternative product to an emerging segment of consumers provided producers new market opportunities. An industry was born.

Then on November 22, 1982, under Memorandum 055, the term *natural* could also be used on meat and poultry items that *contain no artificial ingredients and are minimally processed*.

No longer did natural pertain to a raising protocol. For consumers the term *natural* went from clarity to confusion and misleading labels became rampant. Meeting expectations became difficult as disappointment and confusion eroded consumer trust in labeling.

Perspective:

Since 1981 the demand for naturally raised meat and poultry has continued to increase as demonstrated by the double digit growth of the category, year after year.

Clearly the early-day fear surrounding “negative claim” labeling has been dispelled as thousands of big and small family farms and ranches are now participating in natural programs. Today *natural* has become the fastest growing segment in the livestock industry.

It is now time to bring clarity back to the term natural. The *naturally raised* designation will provide consumers with clear choices regarding how animals are raised and treated, while the term *all-natural*, on processed items can signify the item has been minimally processed and contains no artificial ingredients.