

“Naturally Raised”

**Comments submitted by: Mack H. Graves, CEO
Panorama Meats, Inc.
P.O. Box 94
Vina, CA
(303) 882-5453 mobile**

December 11, 2006

Washington, DC

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.

Panorama Meats, Inc. applauds the Agricultural Marketing Service for starting the process to develop a complete definition for the use of the terms “naturally raised” and/or “natural” for meat and poultry. The vagueness of the current natural definition, “minimally processed and no artificial ingredients” first established some twenty-four years ago, has sown seeds of consumer confusion and 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.

My background also includes serving as interim CEO of Meyer Foods, the parent of Meyer Natural Angus and the second largest natural beef company in the US; President and CEO of Coleman Natural Beef, the largest natural beef company in the US; and Sr. VP of Marketing and Sales for Perdue Farms. All three of these companies use the term natural on packages of their meat and poultry for different reasons, which I will explain, and which are the bases for our contention that “Natural” needs a common definition.

Separating livestock raising from processing and marketing in developing a definition for natural will only add to the confusion that currently surrounds the term. The use of the term must be clearly defined for meat and poultry from “conception to consumption.”

How do you take meat or poultry from animals raised “unnaturally” meaning with growth stimulants, etc., and make the meat natural by minimally processing it with no artificial ingredients? “Natural” should mean that livestock have been naturally raised, having ingested and inhabited only that which is available in nature. This definition would overlay all the other claims such as “antibiotic-free,” “raised without hormones or antibiotics,” “drug-free,”

“chemical-free and others that refer to what the animal has ingested. Additionally, all the feeds available for the livestock would be as they are in nature -- in other words not chemically altered, or “enhanced” with growth promotants or other unnatural chemicals.

How then do you verify natural? 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, but it would remain a self-certification program. All participants in the production chain – producers, processors and marketers -- would have to affirm that they abide by the natural definition through sworn affidavits. Such affidavits would be part of the Federal rule for “natural,” and misuse of them would be punishable.

My experience at Panorama, Meyer and Coleman has taught me that a natural program that exists from conception to consumption is workable and believable. My experience at Perdue taught me that “natural” is a term that resonates with consumers, but needs a definition that consumers can easily understand and believe

In summary, the definition of natural must stretch from livestock lifestyle to their diet to the processing and marketing of meat and poultry. If the new natural definition is verified to have been followed, then the words “USDA Natural” can be placed on the resultant package of meat and poultry.