

From: cwissner@uwyo.edu
To: [Naturallyraised;](#)
CC:
Subject: AMS No. 283-06 Naturally Raised Livestock
Date: Thursday, January 04, 2007 5:18:18 PM
Attachments: [ATTACHMENT.TXT](#)

This letter is in response to the USDA's "listening" sessions going on throughout the country on the term "Naturally Raised Livestock". I currently raise small ruminants on 200 acres of hard grass prairie, sub irrigated pasture and irrigated hay fields. My 200 acre farm is currently certified organic under the NOP through OCIA and IFOAM.

I am not convinced that certified organic livestock is the path I want to take; at this time the "Naturally Raised" title, has more flexibility, providing the terms are written to not exclude certain areas of animal husbandry.

My concerns are this: allow for the use of vaccines as needed to protect breeding stock animal from regional health issues and general preventive health maintenance for the life of the (breeding) animal.

Allow the use of antibiotics in breeding stock only if the animal's health warrants its use. For example: but not limited to mastitis, wounds, and complications from birthing and respiratory problems. Antibiotics should be used in accordance with the manufactures directions and only used as long as necessary to correct any health problem.

Antibiotics should not be used in animals intended for market. However animals that have been given antibiotics should be allowed to graze with the rest of the herd, but not sold as "all natural". Breeding stock given antibiotics to correct a health issue should not be used as market animal, but still remain in the herd for their intended purpose.

Antibiotics should not be allowed or used as a feed component to enhance animal growth, or preventative health issues arising from the producer's operations.

Growth hormones shall not be used to enhance animal growth at any stage of the animal's life.

Allow the use of pro-biotics as a follow up to any use of antibiotics or pre emptive

health problems such as: pre or post shearing, birthing, or other potentially stressful situations.

Naturally raised livestock should have access to pasture and should not be in a year round confined feedlot situation. While year round access to pasture may not be practical in some areas of the country, due to drought, floods or other natural occurrences, a feedlot or corral may be the only recourse to feed and protect the producer's animals and maintain the integrity of the pasture. Naturally raised livestock should not be in a feedlot situation for the entire life of the animal. My suggestion would be no more than 1 month in a confined feedlot for any ruminants during the course of the animal's life, and preferable not concurrent days, unless dictated by the weather or range conditions.

Naturally raised livestock should have access to pasture, hay or other forage appropriate for the producers region. Silage or ensilage should be feed on a limited basis depending on the current weather and the producer's regional availability of pasture or baled forages. Grains, such as; corn, wheat, barley, or oats should not have chemical additives that enhance or promote un-natural growth of the animal. Supplement feeding of grains should never be the sole source of the diet; its use should also be limited, but not eliminated. Supplemental minerals both loose and in tub form should be allowed.

Regional difference need to be taken into consideration, as a one-size-fits-all approach to animal management does not work. Case in point: In the western United States where water is in very short supply and annual moisture can range from 9 to 15 inches. Our western prairie is considered to be mixed grass species, comprising of short (3 to 10 inches) and medium (10 to 15 inches) tall native grass. In addition to wind, soil conditions and altitude raising livestock in the west is always challenging. A Combination of pasture and baled forage is part of best management practices for western livestock and the land.

All producers in the naturally raised livestock program should have a from-birth to consumer trace back or tacking system. All producers should also have an audit trail of forages, supplements and medicines given to their livestock. The producers should be accountable for the animal at all stages of its life.

The goal of naturally raised livestock should be to enhance, preserve and foster best management practices of both the animal and the environment, without the use of growth enhancement drugs, antibiotics, or compromising the producer.

Sincerely,

Catherine Wissner
620 CR 146
Carpenter, WY 82054
307.649.2430