

Organization for Competitive Markets Fax Cover Page

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Comments:

Please accept these comments on behalf of the Organization for Competitive Markets

Sincerely,

Steve Cady, Executive Director
Organization for Competitive Markets

The purpose of product differentiation for family farmer entrepreneurial agriculturists is to provide a countervailing power to the tremendous market power of those in traditional food production and marketing industries. The definitions and terminology mean huge differences in values captured. For instance the claim on "Grass Fed. --Grass, green or range pasture, or forage shall be 80% or more of the primary energy source throughout the animal's life cycle." This claim as compared to one where forage shall be 95% or more of the primary energy source throughout the animal's life cycle and a limited starch content supplement is vastly different in terms of implications for many small producers profitability just by consideration of the number of producers that can or will meet the standard.

The Organization for Competitive Markets would like to see this set of standards allow producers to raise the bar for standards and thus quality and values that potentially may be captured from the marketplace. We ask that the Livestock and Seed Program develop a more interactive process for gaining input from producers about their production and marketing practices and methods. This would allow producers to provide input on how they produce, why it is important and why from their experience it benefits them in marketing their products and ultimately benefits consumers.

In summary we believe it is crucial to appropriately identify the terms and definitions as well as the levels or percentage of compliance within those terms and definitions in order to provide producers the ability to develop product identity and loyalty with consumers. This extra effort to correctly develop standards will insure that the resulting labels ensure consumer confidence in their nutrition and food choices.

We would suggest a renewed effort to bring producers into the process, and to also incorporate recent research by experts in entrepreneurial value captured agriculture to address concerns with accurate labeling from both entrepreneurial producers and consumers perspectives.

Thank you for the opportunity to comment.

Very truly yours,

Thomas F. Stokes

Thomas F. "Fred" Stokes
President