



State of Wisconsin
Jim Doyle, Governor

Department of Agriculture, Trade and Consumer Protection
Rod Nilsestuen, Secretary

March 27, 2003

Chief Standardization Branch
Livestock & Seed Program
AMS, USDA
Room 2603-S, Stop 0254
1400 Independence Ave.
Washington D.C. 20250-0254

Subject: Comments on proposed rules for United States Standards for Meat Marketing Claims

Ruminants that are directly grazed on pasture accumulate an unsaturated fatty acid in their flesh called conjugated linoleic acid (CLA). CLA's implications for human health benefits show great promise and is an excellent marketing tool for farmers selling pasture-fed meat.

The proposed standards allow the feeding of "any forage" to count toward grass finishing. The substances in grazed forage that help produce higher levels of CLA oxidize very rapidly under mechanically harvesting conditions. Forages like corn or hay silage will not produce meat high in CLA. In addition, the proposed rule allowing only 80% of the animal's total calorie requirements from forages, could create a loophole where pasture raised animals are grain finished prior to slaughter.

The new standard needs to conform more closely to what is required for "grain finished," where a days on feed standard is used. That is, "a grass fed marketing claim shall only be allowed for animals spending 90 days eating pasture exclusively prior to slaughter."

The proposed standard for grass-fed meat bears little resemblance to what is actually sold in Wisconsin and allowing the 80% loophole, as proposed, would create confusion among consumers and destroy consumer confidence in meat labeling standards. I recommend the proposed meat labeling standard be dropped and encourage the Livestock & Seed Program to further consult with industry experts and family farmers raising grass-fed animals to develop new set of standards that will continue to ensure consumer confidence and support the growth of pasture-raised meat products.

Sincerely,

A handwritten signature in black ink, appearing to read "Rod Nilsestuen".

Rod Nilsestuen
Secretary

Wisconsin Food and Agricultural Products - \$40 Billion for Wisconsin's Economy

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