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March 21, 2003

Chief, Standardization Branch
Livestock and Seed Program
AMS, USDA, Room 2603-S, Stop 0254
1400 Independence Avenue. SW
Washington, DC 20250-0254

Re: Comments to Docket LS-02-02

In order for consumers to have confidence in claims of food marketers, definitions must be clear. I agree with Food Animals Concern Trust (FACT) that changes in the above proposal are needed to assure that claims on these products clearly indicate humane treatment of animals as well as health concerns of consumers. The following changes are requested:

Claims Dealing with Antibiotics

1. In addition to the claim, "no antibiotics used" or "raised without antibiotics," include the statement, "Livestock have never received antibiotics from birth to harvest."
2. Do not use "no subtherapeutic antibiotics used," as the term has not been approved by the USDA, the FDA or other federal agencies. It is therefore open to abuse by the industry.
3. Do not use, "not fed antibiotics," as antibiotics can be administered in other ways.

Free Range and Pasture Raised

1. Allow the terms, "free range" and "pasture raised," but include that "livestock have had continuous and unconfined access to pasture from birth to harvest."
2. Do not allow "free roaming" or any derivative. In actual practice this term is often used to describe conditions where animals are raised in barns or buildings and roam freely, but do not have access to the outdoors.

Grass Fed Claims

1. The USDA is proposing that the definition for grass fed for cattle should be "Grass, green or range pasture, or forage shall be 80% or more of the primary energy source throughout the animal's cycle of life." As this definition applies to all cattle raised for beef, including those who are finished on corn in a feedlot, FACT believes it should be changed to 100% of the primary energy source.

I appreciate the opportunity to comment.


Clair Cohen