

FAX TO: Chief, Standardization Branch

202-720-1112

RE: Docket No. LS-02-02

We are pleased that the USDA is giving us the opportunity to comment on ~~LS-02-02~~

However, we are concerned about the section which is referred to as "Breed Claims". Under the proposed Breed Claims it states "claims for breed of livestock must meet established criteria by an AMS-recognized U.S. breed association for the referenced breed." For the good of all, it should be "claims for a breed of livestock must include at least one verifiable pedigree in the immediate previous generation of the market animal and this pedigree must be issued by an AMS-recognized U.S. breed association for the referenced breed."

- Berkshires are known for meat quality.
- A pedigree cannot ascertain meat quality.
- American Berkshire Association AMS/PVP designed for only 100% Berkshire (pedigree).
- Research proves meat quality superiority from both 50% & 100% Berkshire market hogs.
- American Berkshire Association developed the first 50% Berkshire program (Berk Gold).
- Eden Farms markets pork from at least 50% Berkshire pigs (one parent registered).
- Eden Farms can provide extensive documentation on customer satisfaction.
- Eden Farms is the largest domestic supplier of Berkshire pork.
- Eden Farms was the first to use an FSIS-APPROVED label - "Certified Berkshire Pork".
- Eden Farms is concerned about punitive action from the American Berkshire Assoc.
- Eden Farms is asking for an exemption from ABA potential rules as an existing company.

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