Pennsylvania Association for Sustainable Agriculture

March 31, 2003

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

Docket Number LS-02-02

Dear Chief, Standardization Branch:

After careful review of the proposed standards, we are concerned that these claims could undermine the integrity of the labels they seek to define, mislead consumers, and have a devastating affect on small and mid-sized farmers who are pioneers of these marketing claims.

Founded in 1992, the Pennsylvania Association for Sustainable Agriculture (PASA) is a non-profit, educational organization with a membership of over 1200 farmers, consumers and professionals throughout Pennsylvania and the nation. We seek to promote profitable farms that produce healthy food for all people while respecting the natural environment. We educate farmers about profitable and environmentally sustainable production methods and help them identify local markets for their products.

As written, USDA's proposed meat marketing rules would negatively impact our membership- both farmers and consumers. Our farmers are pioneers, producing and marketing products from pasture raised animals to a local customer base. Their customers seek out these products in order to support these farming methods and reap the health benefits that come from the meat of ruminants raised on forage, not grain. PASA is deeply concerned that the rules as proposed would obscure these differences, and lead to consumer confusion.

This would obfuscate the important attributes that make the products of our members unique.

A. **PASA recommends tightening the definition of "Grass –Fed" for beef and lamb to require 100% of their diet be animal-harvested fresh pasture, or seasonally-stored pasture-derived forage, for 100% of the post-weaning life cycle.**

The label claim for "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") appears to create a loophole for producers who want to market their livestock as grass-fed when in fact the animal is receiving grain or corn silage supplements for a large percentage of their production cycle. Without some definition incorporating grass-fed to mean pasture or pasture-based stored forage (off season only) a feedlot using mostly corn silage would count (not what the customer expects).

Furthermore, the grass-fed claim could confuse consumers who buy grass-fed meat for specific, nutritional benefits only achieved when livestock are strictly grass-fed for their entire production cycle. To preserve the health benefits of 100% grass fed beef and lamb, and to differentiate the grass fed label from the beef and lamb industry as it presently exists, it is important that the grass fed label require 100% of the diet be derived from grass (fresh pasture) and related forages. PASA recommends tightening the definition of "Grass –Fed" for ruminants to require 100% of their diet be animal-harvested fresh pasture, or seasonally-stored pasture-derived forage, for 100% of the post weaning life cycle.

B. **PASA recommends that the standard for swine be described to allow for three distinct strategies of hog production: 1) Pasture Raised, 2) Free Range or Free Roaming, and 3) Pasture Finished.**

PASA supports a variety of alternative, natural swine production methods, including raising hogs on pasture, in deep-straw barns, or in hoop houses with access to the outdoors. Any of these approaches is acceptable to us, and would be to most consumers of naturally raised meat products. However, it is important to differentiate between market hogs that have enjoyed free access to quality pasture for their entire production cycle, from those that have not.

We recommend that the label **"Pasture-Raised"** be reserved for those animals that, from birth to death, have always had access to pasture, and have never been confined to an indoor or outdoor feeding floor of any kind.

In contrast, the labels **"Free Range" or "Free Roaming"** may be used for animals that have been raised for all or a portion of their life cycle in deep-straw

barns, where they may freely move about in an unrestrained manner. These animals have never been confined to an indoor or outdoor feeding floor of any kind.

The majority of hog production today is generated by farmers who purchase feeder pigs that may be of indeterminate origin. We also feel that farmers who purchase such feeder pigs that have completed no more than the first 20% of the production cycle should be allowed to use the label **"Pasture Finished"** if these animals are finished throughout the remaining 80% of the cycle in conditions that include constant access to quality pasture (i.e. without ever being confined during the last 80% of their lives to an indoor or outdoor feeding floor).

As a consequence of the above recommendations, it is worth noting that certain market animals might very well be labeled "Free Range and Pasture Finished" if they meet both of the respective standards simultaneously.

C. **PASA supports the claim "No antibiotics used" or "Raised without antibiotics."**

PASA supports the proposed claim ("No antibiotics used" or "Raised without antibiotics") and the accompanying standard ("Livestock have *never* received antibiotics from birth to harvest"). Both the claim and standard are clear and unambiguous. They leave no room for equivocation by producers and accurately convey to consumers meaningful information on antibiotic use.

D. **PASA urges that USDA abandon the claims for "No subtherapeutic antibiotics added" or "Not fed antibiotics" and replace them with a new claim for "No antibiotics used except for disease treatment."**

PASA objects to both alternative formulations for the proposed claim. The term "not fed antibiotics" is confusing. Most consumers don't understand the significance of animals being fed antibiotics as opposed to receiving them by other means such as injection. Many consumers could easily assume the proposed claim is equivalent to the claim of "No antibiotics used". Moreover, strictly speaking, the "not fed antibiotics" language does not discriminate among antibiotics administered to animals for different purposes, and may in fact lead to the ridiculous situation where farmers are <u>encouraged</u> to inject antibiotics for purposes of production efficiency. FDA has approved antibiotics for use in livestock feed for a variety of purposes ranging from feed efficiency and weight gain to treatment of bacterial disease. The alternative formulation, "no subtherapeutic antibiotics added" is also confusing and, moreover, subject to enormous abuse. As proposed, this claim creates a gigantic loophole in the existing standards, and thereby will sow greater confusion and inefficiencies in the consumer marketplace.

The claim "No antibiotics used except for disease treatment" would fully meet consumer expectations that livestock were administered antibiotics only when clearly justified by clinical indications of illness. We suggest that the standard for this claim would require that livestock only be administered antibiotics approved by FDA for disease treatment and that antibiotics approved for feed efficiency, weight gain, disease prevention, and disease control would not be permitted.

E. **PASA recommends that USDA abandon the claim for "No detectable antibiotic residue"**

PASA opposes the claim "No detectable antibiotic residue". Without additional information, consumers are likely to confuse a claim for "no detectable residues" with other claims, such as "no antibiotics used." Moreover many consumers believe that antibiotic residues are the principle problem associated with agricultural antibiotics and cause antibiotic resistant infections in people, even though the limited available science suggests that the role of residues is relatively minor. Available science suggests that it is the administration of antibiotics to livestock, rather than the detectable presence of residues, that is linked to the development of resistance in humans.

PASA urges USDA to clarify and strengthen all of these standards to support the hard work of entrepreneurial farmers in the US. Let's give consumers clear and honest information about how these animals are raised, and celebrate diversity within our agricultural system. Thank you for your consideration of these requests.

Sincerely,

Ruth Sullivan, Director of Southeast Programs

Brian Snyder, Executive Director
Pennsylvania Association for Sustainable Agriculture
(717) 917-3731
ruth@pasafarming.org