March 24, 2003

Dear USDA,

Please ensure your language will be CLEAR & MEANINGFUL for the subjects mentioned below.

Sincerly,

Roger A Winkler

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- **"No subtherapeutic antibiotics added" or "Not fed antibiotics"**

Animals can receive antibiotics by means other than feed. USDA must alter the second phrase to read: "Not administered antibiotics." USDA's proposed definition for these phrases includes the statement, "Livestock are not fed subtherapeutic levels of antibiotics." USDA should change the definition to read: "Livestock do not receive subtherapeutic levels of antibiotics."

- **"Free Range, Free Roaming or Pasture Raised"**

USDA's definition for this phrase regarding the environment provided to cattle, sheep and swine is loophole-ridden. It should be re-defined to require that: 1) "Each individual animal shall have continuous, unconfined and unobstructed access to pasture throughout their life;" 2) "Pasture" include: "Vegetative cover and environment appropriate to the species in terms of diet and natural behavior;" and 3) "Animal density must be restricted so that animals can fulfill normal patterns of behavior and so that healthy pasture or range is maintained."

- **"Grass fed"**

USDA's proposed language would allow farmers confining animals in feedlots to make a "grass-fed" claim. USDA must require that: Animals have had continuous, unconfined and unobstructed access to grass (including legumes and forbs) pastures throughout their life. When free-standing forage is unavailable during the winter season cattle will continue to be fed an 85% forage derived diet."