March 25, 2003

William T. Sessions, Chief

Dear Chief Sessions,

I am writing to comment on the USDA Agricultural Marketing Services' proposed livestock and meat marketing claims (Docket No. LS-02-02).

The current proposal should be scrapped and a new one drawn up after more consideration for consumers and farmers and ranchers who are providing meat using healthier alternatives that will benefit everyone, and less for industrial style animal producers.

Please remove the "no antibiotic residues" claim. Since we are really more concerned with antibiotic resistance. Under current law, meat producers already must subject animals to a period of withdrawal from antibiotics prior to slaughter to avoid antibiotic residue.

Please remove the "not fed antibiotics" claim. "Not fed antibiotics" can be claimed on any meat products from animals raised without "subtherapeutic" antibiotics. Unfortunately, the USDA does not define the term "subtherapeutic," so meat producers who use large amounts of antibiotics for growth promotion and other nontherapeutic purposes can still use the label "not fed antibiotics."

Please call things what they are. "Grass-fed" should mean only that - if animals receive as much as 20% of their nutrition from sources other than grazing, they are not grass fed and should not be labeled as such. Cattle that are truly grass fed throughout their lives require few antibiotics. Without further clarification, the proposed "grass fed" label could undermine the desire of consumers to purchase beef products from animals raised without unnecessary antibiotic use and undermine farmers who incur the additional time and costs associated with allowing cattle to fatten on a natural grass diet.

Please withdraw the proposal and consult with a broad range of producers and consumers of alternative meat products.

Sincerely,

Erie, CO 80516