

Chief, Standardization Branch

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.

Because the American Berkshire Association (ABA) is the only registry for Berkshire hogs in the United States, it would automatically be the recognized breed association. Currently the ABA is moving forward with an AMS/PVP designation which will only include 100% registered purebred hogs that have been registered with the ABA. The wording therein has created concern within producers who are involved in selling differentiated pork products.

Most Berkshire association members believe the ABA's AMS/PVP purpose is to weed out nonconformist from a foreign market (namely Japan). With such rigid guidelines, the newly devised ABA standards could limit the growth of any firm that is currently marketing pork from any hogs with a high percentage of Berkshire breeding. The ABA currently has no plans for the marketing of crossbred Berkshire hogs. Noticeably, this is a change from the history of the ABA as the breed association was the first to develop and promote a program designed to market 50% Berkshire hogs (Berkshire Gold).

Briefly, Eden Farms Certified Berkshire (EFCB) began selling pork into the domestic markets in November 1998. These sales were a result of poor economic conditions in Japan that had previously purchased 50% Berkshire hogs, under a program designed by the American Berkshire Association called Berkshire Gold. During the peak week, more than 4500 head were sold and by 1998 these numbers had decreased to nearly half that number. At that same time, hog numbers were burdening the domestic market and by the fall of 1998, a market hog was barely worth \$20/head by December. EFCB producers recognized a demand as chefs were beginning to look for improved taste and flavor coupled with consistency. EFCB began to fill that void and since 1998 sales have increased dramatically. The Berkshire pork sold by Eden Farms is distributed throughout 17 Midwestern states and graces fine dining establishments in South Carolina, New York, New Jersey and California.

Berkshire hogs have been known for superior meat quality more than 300 years. The problem with depending on a Berkshire pedigree to define meat quality however, can be misleading. There exists a great deal of variation within the Berkshire breed, even though all these hogs are registered with the ABA and are given a pedigree. For example, in the 1999 National Barrow Show Progeny Test, the Berkshire Meat Quality Sire Scores ranged from 42.19 up to 90.34. Noticeably that wide range of scores indicates that all Berkshire sires are not equal in muscle quality characteristics or especially eating quality traits.

The ability to evaluate market hogs for meat quality began in 1992 when the National Pork Board (NPB) spearheaded a genetic evaluation test that compared 3,261 crossbred pigs from different sire lines. Those tests demonstrated that crossbred Berkshire sired hogs were far superior to all other hogs when meat quality traits were evaluated. Dr. Rodney Goodwin, research director for the National Pork Board, noted that the meat quality traits of Berkshire-sired pigs could be the result of dominant genes as Berkshire sired pigs consistently topped all other crosses of pigs regardless of the mother line used. Possibly related to this testing process meat scientists redesigned the color scale, expanding it from five points to a six-point color scale (1 to 6 with 6 being the darkest) for pork. Acceptable Berkshire pork has a distinctive darker color (generally between 4 and 6) and this pork is associated with increased meat quality compared to lighter colored pork. Additionally, muscle firmness, reasonable marbling and a hard white fat were all determined to be characteristic of pork from market hogs sired by Berkshires. Noticeably these pork characteristics are unique and can only be achieved by using the proper Berkshire breeding stock.

However, under the ABA system of certification there is no mention of meat quality, only of

pedigree. Additionally within the ABA certification process, there are no defined criteria that even remotely distinguish those traits that define Berkshire meat quality. Pedigreed Berkshire hogs with Meat Quality scores of 42.19 most likely would not meet a pork color score from 4-6. Farmland Industries at Crete, NE, would reject loins from Berkshire Gold (50% pedigreed Berkshire) when the color score was a 1 or a 2 on the old 5-point color scale, reported an ABA official.

In contrast, EFCB markets pork from hogs that are at least 50% Berkshire and requires that at least one pedigreed animal be present in the previous generation. Additionally, every EFCB loin has to conform to meat quality standards that were defined by the scientific NPB genetic evaluation test. Every loin is individually examined for the distinctive characteristics (muscle color, marbling, firmness along with color and texture of fat) that clearly differentiate Berkshire. EFCB requires that all these criteria need to be met before pork is sold.

The ABA has members that use genetics that emphasizes meat quality and members that use genetics that emphasizes show ring quality. Thus, when boars are evaluated for meat quality, wide discrepancies can be found, as in the previous mentioned 90.34 versus 42.19 meat quality scores. In contrast, EFCB producers use genetics for production oriented traits but those animals must also have a history of true Berkshire meat quality (the 90.34 type pigs not the 42.19).

EFCB producers value the attachment to the American Berkshire Association through the purchase with transfer registered Berkshire breeding stock on a routine basis. A goal of the ABA is to eliminate both the stress and napole genes from the Berkshire breed. EFCB producers totally agree with those goals. But EFCB members are commercial hog producers that need flexibility to remain in business. EFCB believes in the value of a parent breed association that maintains the pedigree that assures Berkshire lineage is present in the pork that Eden Farms sells, however, the producers do not support the ABA contention that the hogs must be 100% Berkshire. EFCB guidelines recommend that the producers use sows that are ½ Berkshire bred to a Berkshire boar that is unrelated to the maternal line. EFCB believes there is value to producers that have a crossbred dam so that the producers may obtain a litter that has 100% heterosis when she farrows her litter. This heterosis has been shown scientifically to be beneficial as it manifests itself as vigorous, healthy, active piglets and alleviates the problems with lowly heritable reproduction traits. While EFCB is flexible in the genetics used to create the non-Berkshire side of the maternal line, EFCB does not deviate from the meat quality standards that were defined earlier as being indicative of Berkshire genetics (muscle color and firmness coupled with adequate marbling and visible hard, white fat). Consistent meat quality is a staple for Eden Farms and it is assured every time as all loins are evaluated.

If the ABA is allowed to set rules from the proposed guidelines for Berkshire that only allows the marketing of 100% Berkshire hogs in the domestic trade, this guideline will drive EFCB producers out of business and eliminate another avenue of protein distribution. The ABA methodology of only using a pedigree with total disregard to meat quality could be the death knell of Berkshire hogs in the long run. However, the rigid rules by the ABA's AMS/PVP to only accept 100% registered breeding will be the death knell of most producers. Lack of heterosis, lighter weight litters consisting of smaller pigs and fewer numbers of pigs will increase the cost of production to unprofitable levels. Berkshire progeny inherently grow well, but they are less efficient and generate a lower percentage of lean cuts. Currently value to EFCB producers in being achieved by allowing the use of heterosis in developing a breeding program but demanding that one of the parents of the market hogs be a pedigreed Berkshire hog. The pork that is

marketed under the EFCB label that has achieved recognition nationwide as that product displays the meat quality traits that can only be achieved through the use of Berkshire breeding stock.

Eden Farms Certified Berkshire was the first organized company, the American Berkshire Association included, to use the words "Certified Berkshire".

Eden Farms Certified Berkshire was the first FSIS established labeled company to market Berkshire pork in the United States. Eden Farms Certified Berkshire is the largest domestic supplier of Berkshire pork.

EFCB should not suffer discrimination on the domestic market because of the ABA focus on an export market and particularly the Japanese market. Because EFCB was the first in the domestic market, it should receive an exemption from the ABA rules as a pre-existing company.

Sincerely,
John Boyette