

Dear Chief,

3.26.03

Regarding Docket Number LS-02-02 concerning Meat Marketing Claims, I urge the Agricultural Marketing Service of USDA to:

- 1) Withdraw proposed meat marketing claims and standards and start over again. I urge you to consult closely with family farm, consumer, humane, and environmental organizations before issuing a final proposal.
- 2) I care deeply about being able to purchase grass-fed, free-range, and antibiotic free meat and want proposed USDA claims to meet my expectations.

In addition, I have a point to make the USDA proposes a label claim for "no antibiotics used, or raised without antibiotics," which is satisfactory. However, you also propose a label claim for " no subtherapeutic antibiotics added or not fed antibiotics."

The claim stating "no subtherapeutic antibiotics added " has serious definitional problems. USDA does not define the term "subtherapeutic" and other institutions have varied and conflicting definitions. They propose a labeling claim for "no detectable antibiotic residue", which could mislead consumers to believe that they are purchasing meat from producers whose practices do not contribute to antibiotic resistance, even though producers using the claims are using antibiotics.

Also, I am concerned that the label claim for "Grass-Fed" appears to create a loophole for producers who want to market their livestock as grass-fed when in fact the animal is receiving grain supplements for a large percentage of their production cycle.

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 in the final months before slaughter.

I am also concerned that the claim for "Free-Range, Free-Roaming and Pasture-Raised" meat has definitional problems as well. The Notice defines these label claims as "Livestock that have had continuous and unconfined access to pasture throughout their lifecycle, including: Cattle and Sheep- which shall never be confined to a feedlot; and Swine which shall have continuous "access" to pasture for at least 80% of their production cycle." The proposed labeling claims do not provide a definition for "feedlot" as it relates to Cattle and Sheep, and they do not define "access" in the case of swine.

Furthermore, it is unclear whether the whole-herd, including the breeder stock for the livestock being produced, are raised continuously under these minimum standards.

Thanks you for listening to my concerns.

Signed,

*Burt Robinson*