



Northeast Organic Farming Association of New York, Inc.

P.O. Box 880 • Cobleskill, New York 12043-0880 • 518-734-5495
Fax: 518-734-4641 • Email: office@nofany.org
www.nofany.org

March 28, 2003

Chief, Standardization Branch
Livestock & Seed Program, AMS
US Department of Agriculture
Room 2603-S, Stop 0254
1400 Independence Avenue, SW
Washington, DC 20250-0254

RE: Docket No. LS-02-02

Dear Sir or Madam:

In the interest of good government, please withdraw the proposed meat marketing claims and standards and start over again. We need government labeling programs that allow consumers real consumer choice, which requires labels that mean what they say. Transparent label requirements can re-invigorate trust in government labeling programs. We call upon you to build the trust in government by making labels conform to the English language and clear, unambiguous definitions worked out in partnership with consumers and farmers. In order to do so with the proposal before you, you need to start over.

The potential environmental and health benefits of 100% grass-fed meats are gained when animals are 100% grass-fed. Changing the allowances to include more farmers and varied feeding practices changes the product and dupes the consumer.

The labeling claim of "no detectable antibiotic residue" is also problematic. This is presumably already a requirement of all animals before slaughter. The larger societal benefits associated with raising meat without antibiotics altogether are not gained by producers who maintain the legal withholding period, nor is the consumer necessarily less exposed to antibiotic resistant bacteria. Yet this label claim implies these benefits, even promotes thinking that there is a benefit to be purchased.

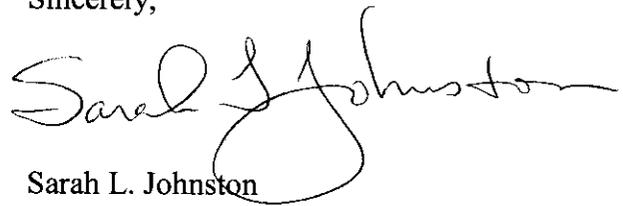
The terms "access to pasture" for "free-range, free-roaming and pasture-raised" meat have definitional problems. There is virtually no difference between animals that have the opportunity to move outside a confined space, such as a feedlot, and animals that have no such access, unless that access is associated with pasture nutrition. Farmers need to maintain a pasture to animal ratio that maintains the food requirements and health requirements of the animal. Without requirements for a land base, the definition of animal access as framed in the current proposal can mean many things and not the pasture farming that some farmers are willing to provide in order to satisfy demanding consumers.

Growing Organic for the Future

p. 2
NOFA-NY
March 28, 2003

Farmers need USDA's help in labeling meat products that reflect their actual farming practices, in order to gain consumer confidence. That confidence will not be gained with half-truths. We look to government to set transparent label standards that are clear to everyone and preserve the benefits sought by consumers, who are, after all, driving farmer interest in producing meats in ways they believe to be preferable.

Sincerely,

A handwritten signature in black ink that reads "Sarah L. Johnston". The signature is written in a cursive style with a large, prominent loop at the end of the word "Johnston".

Sarah L. Johnston
Executive Director
(518) 922-7937