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March 26, 2003

William T. Sessions, Chief
Standardization Branch
Livestock and Seed Program
AMS, USDA, Room 2603-S, STOP 0254,
1400 Independence Ave, SW
Washington, DC 20250-0254

Dear Mr. Sessions,

I am writing to urge you to withdraw and reconsider USDA Agricultural Marketing Services' proposed livestock and meat marketing claims (Docket No. LS-02-02). If adopted, many of the proposed claims and standards will create giant loopholes for industrial style meat producers, mislead consumers, and potentially destroy the livelihoods of farmers raising animals without antibiotics.

Four proposed claims and standards pertaining to antibiotic use in animal agriculture merit special attention.

The claim "no antibiotic residues" ignores the real issue of concern to consumers: antibiotic resistance. Antibiotic residues in meat are not major causes of resistance, and under current law, meat producers already must subject animals to a period of withdrawal from antibiotics prior to slaughter to avoid antibiotic residue. The "no antibiotic residues" claim is unnecessary and should be abandoned.

The proposed claims "not fed antibiotics" and "raised without antibiotics" are confusing to consumers. "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." Most consumers will not be able to discern a difference between the claim "not fed antibiotics," and the more stringent claim "raised without antibiotics." The resulting consumer confusion would spell disaster for farmers who genuinely raise animals without antibiotics. The "not fed antibiotics" claim should be withdrawn.

Finally, USDA has proposed that meat can be labeled "grass fed," even if animals receive as much as 20% of their nutrition from sources other than grazing. The "grass fed" claim and standard has implications for consumers concerned about antibiotic use. Cattle sent to industrial style feedlots in their final weeks before slaughter - a practice now the norm in the beef industry - are fed a diet consisting primarily of corn and other grains. This unnatural diet fattens the cattle faster, but can cause diseases such as liver abscesses. These diseases are one reason that feedlot owners lace feed with antibiotics - to treat illnesses created by their choice of feed and management techniques. By contrast, 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.

In short, the current proposed labeling claims appear to benefit industrial style animal producers, who will be able to co-opt desirable meat marketing claims without having to significantly change their practices. If these claims are adopted, the losers will be consumers and the farmers and ranchers who now make their living by providing meat from animals raised by alternative methods.

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I urge you to withdraw and rethink the claims and standards mentioned above, after consulting with a broad range of stakeholders, including producers and consumers of alternative meat products.

Sincerely,

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