



Conservation Beef

March 19, 2003

Chief, Standardization Branch
Livestock and Seed Program, AMS, USDA
Room 2603-S, Stop 0254
1400 Independent Avenue, SW
Washington, DC 20250-0254

To whom it may concern:

Thank you for the opportunity to comment on the Standards for Livestock and Meat Marketing Claims. Comments from Conservation Beef, LLC, are as follows:

Proposed USDA marketing claim standard:

Geographic Location Claims—Background: Producers, processors, and retail/foodservice operators may want to differentiate their products by identifying the geographic region where the product was produced. References to individual States, countries, or specific or general geographic areas (e.g., Dakotas, Western) will constitute geographic location claims.

Claim and Standard:

- Location of Raising (e.g., “Mid-Western Raised Lamb” or “Raised in Montana”).—The livestock are raised/grown in the specified geographic location from birth to harvest.
- Location of Finishing (e.g., “Rocky Mountain Fed Lamb” or “Nebraska Fed Beef”).—The livestock are fed/finished in the specified geographic location for at least the last 100 days prior to harvest.

Comment:

For grass fed beef producers who wish to make the “location of raising” claim, the proposed standard may present a problem: If a producer temporarily ships animals to another locality to facilitate keeping the animal on grass (say, for a 3 to 5 month complementary grass season in another state), they could not make the claim even though the animal was born and harvested in the “home locality”, and likely spent 70% to 90% of its life there.

A better standard would require both birth and harvest in the “home locality”, along with a numerical requirement of 70% to 80% of its lifespan spent there.

Proposed USDA Marketing Claim Standard

Grass Fed Claims—Background: This claim refers to the feeding regimen for livestock raised on grass, green or range pasture, or forage throughout their life cycle, with only limited supplemental grain feeding allowed. Since it is necessary to assure the animal’s well being at all times, limited supplementation is allowed during adverse environmental conditions. Grass feeding usually results in products containing lower levels of external and internal fat (including marbling) than grain-fed livestock products.

Claim and Standard:

- Grass Fed.—Grass, green or range pasture, or forage shall be 80% or more of the primary energy source throughout the animal’s life cycle.

Comment

Supplement may indeed be necessary, especially in northern climes (so long as grass fed animals remain in free-range conditions while receiving supplement). However, the 80% figure for grass/forage over

the entire life cycle of the animal is too broad. In fact, most feedlot-finished beef meet would meet such a standard, and with adoption of this standard grass fed beef would lose any distinction in the marketplace.

A better standard would read: "Grass, green or range pasture, or forage shall be 80% or more daily of the primary energy source throughout the animal's life cycle.

Alternatively, a standard could be established that allows daily grain supplement of up to six tenths of one percent of the animal's body weight (thus, a 1000 lb. animal could receive only up to 6 lbs. of grain in a given day). This is the level at which nutritionists have indicated the benefits of a grass fed animal falter; the animal's rumen begins to display the acidic characteristics of a grain fed animal that more efficiently processes grain.

Proposed USDA Marketing Claim Standard

Aged Meat Claims—Background: Aging is the process by which meat carcasses or cuts is held at a controlled temperature for a specified period, beginning at the time of harvest, to allow enzymatic activity to degrade complex proteins and promote the development of flavor and tenderness. When product is "dry aged" humidity control is also a critical element of the aging process.

Claim and Standard:

- *Aged Meat Products.*—Type of aging and length of postmortem aging (in days) must be specified. The actual number of days aged and type of aging (dry or wet) may also appear on the retail label.

Beef.—Must be wet aged for a minimum of 21 days or dry aged for a minimum of 35 days.

Comment:

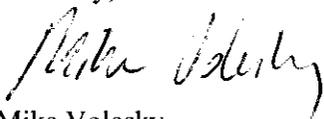
From our own experience and from available research we have concluded that there is no significant advantage to a wet aged product, because enzymatic activity is so limited in an anaerobic environment. It is dry aging that enables enzymatic activity. Thus, it is indeed necessary to require type and length of aging to be specified.

Our experience and available research also indicates that at least 21 days is necessary to achieve the benefits of dry aging. Even more time is needed as cooler temperatures move toward 32 degrees (from a maximum of 36 degrees). Thirty-five days is excessive, and would be necessary only at a temperature very near 32 degrees. To allow for temperature variations, we recommend a standard of at least 21 days.

Although wet aging is of no consequence to us, it follows that at least 21 days (if not more) are necessary for beef to benefit from wet aging.

Again, thank you for the opportunity to comment. If you have questions, please contact us at (406) 495-8653.

Sincerely,



Mike Volesky
Assistant Director, Conservation Beef