

American Grassfed Association
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March 24th, 2003

Via email to: marketingclaim@usda.gov

Via fax to: 202-720-1112

Via mail to: address listed below

Chief, Standardization Branch, Livestock and Seed Program
Agricultural Marketing Service, United States Dept. of Agriculture
Room 2603-S, Stop 0254, 1400 Independence Ave. S.W.
Washington, DC 20250-0254

Please refer to docket No. LS-02-02

As a group of American Grassfed Producers, we have reviewed the Meat Marketing claims outlined in the Federal Register Vol. 67, No. 250, dated Dec. 30th, 2002; for "**Grass Fed Claims**", which states: *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.*

We find the first portion of this statement to be very appropriate, which we restate as: *Grass, green or range pasture, or forage.* However we find the 80% completely inappropriate.

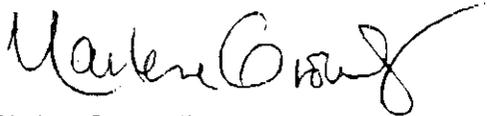
We offer you our minimum criteria for Grassfed, which is:

- Animals have been, from birth to harvest, grazed on grass, legumes and forages as 95% or more of their primary energy source and have received only seasonal supplements that do not exceed 30% starch content.
- Animals have not been:
 - Creep fed as calves;
 - Fed for extended periods in confinement;
 - Or finished on grains (as grain feeding is what destroys the nutritional benefits of grassfed products).

This is a critical issue for us, and so we ask for your highest consideration on the matter.

In closing, we also offer you our assistance; feel free to contact any of us should you have questions or want clarification of any kind.

Respectfully Submitted,



Marlene Groves, Chair
American Grassfed Association
Steering Committee is listed on the following page

American Grassfed Association

*Organized to Protect and Promote True Grassfed Producers & Products;
As a cooperating multi species entity that Outreaches Nationally
Through Communication, Education, Research and Marketing.*

Steering Committee

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