

# Voices for Animals

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USA

March 6, 2003

Chief, Standardization Branch  
Livestock & Seed Program. AMS  
USDA  
Room 2603-S  
Stop 0254  
1400 Independence Ave., SW  
Washington, DC 20250-0254

Re; Docket No. LS-02-02.

An increasing amount of meat is marketed with claims such as "free range" and "antibiotic free". Clear and meaningful language will provide consumers with important information about how animals are raised. Below are, in bold type, are USDA's proposed claims followed by recommendation of how USDA must strengthen its definitions and remove potential loopholes that would be exploited by the industry.

**"NO SUBTHERAPEUTIC ANTIBIOTICS ADDED" OR "NOT FED ANTIBIOTICS"**  
Animals can receive antibiotics by means other than feed. The second phrase could read "Not administered antibiotics". The proposed definition includes the statement, "Livestock are not fed subtherapeutic levels of antibiotics". USDA should change the definition to read: "Livestock do not receive subtherapeutic levels of antibiotics".

**"FREE RANGE, FREE ROAMING OR PASTURE RAISED"**  
USDA's definition is loophole ridden. It should be re-defined to require that: each individual animal shall have continuous, unconfined and unobstructed access to pasture throughout their life; "Pasture" include: "Vegetative cover and environment appropriate to the species in terms of diet and natural behavior"; and "Animal density must be restricted so that animals can fulfill normal patterns of behavior and so that healthy pasture or range is maintained".

**"GRASS FED"**  
USDA's proposed language would allow farmers confining animals in feedlots to make a "grass fed" claim. USDA must require that: Animals have had continuous unconfined and unobstructed access to grass (including legumes and forbs) pastures throughout their life. When free-standing forage is unavailable during the winter season cattle will continue to be fed an 85% forage derived diet".

We request these changes.

Sincerely,

Nazen Merjian, VFA

