

FAX MESSAGE

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To:	Barry Carpenter	Fax No.	202-720-3499
From:	Consumers Union	Fax No.	914-378- 2910
Date:	March 18, 2003	Contact No.	914-378- 2351
Re:	Proposed Meat Claims	Page	3
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Comments

Thank you for your consideration.

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Thank you.

Consumers Union

Publisher of Consumer Reports

March 18, 2003

Mr. Barry L. Carpenter
Deputy Administrator
Livestock and Feed Program
Agricultural Marketing Service 2029
South Agriculture Building
1400 Independence Avenue, SW
Washington, DC 20250

Dear Mr. Carpenter:

Consumers Union is responding to the December 20, 2002 Notice published by the Livestock and Feed Program for U.S. Standards for Livestock and Meat Marketing Claims. By this letter, we request an extension of the comment period.

Consumers Union, the nonprofit publisher of *Consumer Reports*, has been evaluating the safety and effectiveness of consumer products for more than sixty years. Our goal is to help consumers make better, more informed purchasing decisions. In the past three years, we have evaluated more than 80 environmental labels on food products, including many of the claims covered in this proposed rule. We continually update our findings, which are available free to the public at www.eco-labels.org.

We commend the Department for its interest in adding scope and definition to many of these marketing claims and for seeking public comment before implementing these label standards. However, we have broad concerns regarding the scope of this proposed rule and the verification process. In addition, we have specific concerns regarding the meaning and consistency of many of the label standards as well as the documentation of value added for products using the labels. These issues could undermine the integrity of these labels, which blunts consumer confidence in purchasing or paying a premium for products found with these labels.

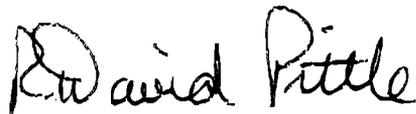
For these reasons, we share the concerns of other groups and ask that the Agricultural Marketing Service postpone finalizing meat marketing label standards at this time. We believe that the process of developing the standards should focus not only on the details of the standards but also on how the marketplace and consumers will perceive these labels. We ask that you convene a multi-stakeholder dialogue that represents a broad cross-section of those who will be affected by these labels in the marketplace. You may

want to hold hearings and/or focus groups. While this approach may take more time, we are convinced that consumers will benefit from the results of such an expanded process.

We would like to pursue these concerns with you further and request a meeting to discuss options for moving forward. We plan to respond in detail to the Notice by March 31, 2003, but we hope the proposal will be withdrawn or the comment period extended to allow for a more broad interactive process to be implemented.

Thank you in advance for your consideration. Please contact Jean Halloran or Urvashi Rangan with Consumers Union (914-378-2351) to arrange a meeting time or to answer any questions you might have.

Sincerely,



R. David Pittle Ph.D., Senior Vice-President for Technical Policy



Jean Halloran, Director, Consumer Policy Institute



Urvashi Rangan, Ph.D., Director Eco-labels Project