March 23, 2003

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

Dear Mr. Carpenter,

The proposed definition of the claim "grass fed," as it may appear on future USDA approved beef labels, is meaningless in the context of the current United States cattle market and would violate consumer trust if put into effect.

The huge majority of all beef cattle in the United States are "finished" on a grain-based ration in a commercial feed lot. Even so, virtually all American cattle spend 80% or more of their lives on pasture eating grasses, legumes and naturally occurring seeds (grain). Calling these animals "grass fed," as proposed in the new label claim definition, ignores the fact that in most cases their whole diet for the last few months of their lives contains no grass at all. Calling these animals "grass fed" therefore becomes meaningless since virtually all cattle are grassfed as in the proposed definition.

However, for the last decade, a small, but growing number of producers, including ourselves, have been marketing cattle finished exclusively on pasture and hay without the use of unnatural levels of grain-based feeds. This grass-finished beef has been marketed as "grassfed" or "grass-fed", and these terms have come to be recognized by millions of consumers. The enormous publicity over the last year for grassfed meats (following on best-selling books such as The Omega Diet and Fast Food Nation) has reinforced the perception that "grass fed" is synonymous with grass-finished and, by extension, that no supplemental grain has been provided to the animals.

So, I feel that to call an animal that has received as much as 20% of its total nutrition in a grain feeding finishing program "grass fed" could be misleading and confusing to the consumer. Grain finishing of ruminants is an artificial feeding practice born of our unique circumstances here in the United States. Grass

feeding is the basis for ruminant health consistent with the genetic structure and nutritional requirements of the animals. The claim "grass fed" as used on a USDA-approved label should mean that a grassfed animal has received no grain other than that which is naturally occurring on pasture or in hay feeds.

I am glad that the USDA is attempting to bring some order to the grassfed meat discussion, but I join those voices that have been raised calling for a larger forum in which to discuss the definition of the grassfed claim as well as other new claims. I ask that the March 31, 2003, deadline for public comment be extended indefinitely to give all citizens, most particularly those who have been building the grassfed meats market, our customers, and those who support our efforts, the opportunity to have our perspective thoroughly considered.

Thank you for your serious consideration of my comments.

Sincerely,

Phil Blahut Patrice L. Blong

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