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March 27, 2003

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

Dear Chief:

On behalf of our more than 300 members nationwide of the American Berkshire Association and our Board of Directors, I submit the following comments in support of Docket Number LS-02-02.

The American Berkshire Association (ABA) is the United States' national breed association for Berkshire swine. Founded in 1875, the ABA is the nation's oldest swine registry and has maintained pedigree records of purebred Berkshires since its origination. Our organization is also a proud member of the National Pedigreed Livestock Council (NPLC).

The ABA has operated two marketing programs for several years. The first is the Berkshire Gold program, which requires that pork sold under its label must be at least 50% percent Berkshire genetics. ABA also operates a self-certified 100% Berkshire Meats program. In this program the ABA is developing a process verified program that all pork sold under the 100% Pure Berkshire label has been produced from pigs that are offspring of purebred, pedigreed Berkshire sires and dams. Several packer-processors cooperate in one or both programs.

The superior quality of Berkshire pork is well documented. In a summary of tests conducted over a 10-year span at the National Barrow Show in Austin, Minnesota, Berkshire pigs scored highest of all major American pure breeds in meat sensory quality. From various studies, including the Journal of Animal Science, Berkshire pork was ranked first in 19 of 22 quality measures in four important categories.

The minimum breed claim criteria as described in LS-0202 are extremely important to our organization - not just for the domestic market but also for the international market, and in our

particular case, Japan. There, Berkshire pork products are recognized as “kurobuta,” or black pork. The Ministry for Agriculture, Forestry and Fisheries (MAFF) in Japan changed their regulations early in calendar year 2000 to require pork labeled as ‘kurobuta’ to be 100% Berkshire as recognized by a breed organization or government. Before MAFF adopted this regulation, several firms and individuals were marketing products in Japan as kurobuta without regard to source of the product.

Due to the lucrative premiums for Berkshire meat products, there are those who seek to capitalize on these premiums without actually providing a product that could either be recognized by our organization, or the U.S. or Japanese government. Unfortunately, the consumers of our products are greatly affected with these rogue-marketing efforts. Besides the confusion created in the market place with unsubstantiated products, consumers in Japan have developed a great distrust for labeling and marketing of premium products. These products could not and should not be considered eligible for programs such as ‘process verified’ or ‘certified’ under USDA marketing plans.

We applaud USDA for recognizing the need to establish the minimum breed claim criteria. This is applicable not only to our breed or species of livestock, but others.

It is important to our breed and the other members of the NPLC that a clear and traceable record of animals exists from generation to generation of livestock. Each of the organizations of NPLC is responsible for maintaining the discipline of their membership in enforcing these requirements.

It is important to note the Japanese government places a great deal of respect and trust in the United States government and the standards it adopts. These United States Standards for Livestock and Meat Marketing Claims are critically important to our organization and others who are marketing products worldwide. It is imperative the standards can be verified and documented.

In reviewing all of the proposed minimum requirements for livestock and meat industry production/marketing claims, we have no objection to the other sections. We support and urge USDA to adopt the sections related to breed claims as stated.

Respectfully submitted,

A handwritten signature in black ink that reads "M. Peter Hoffman". The signature is written in a cursive, flowing style.

Dr. M Peter Hoffman
President
American Berkshire Association