

Eileen S. Stommes, Deputy Administrator  
USDA-AMS-TM-NOP  
Room 4007 South, Ag Stop 0275  
P.O. Box 96456  
Washington, DC 20090-6456

Dear Madam:

As a family farm that exists, in part, by producing beef for the American consumer, we would like to express our dismay in the recently proposed rules for the National Organic Program. These proposed rules, formulated originally under the Organic Foods Production Act of 1990, do a disservice to the organic food movement as well as unjustly regulated numerous niche branded beef programs.

Our family farm is one of approximately 260 family farms in the country that supply beef to the lean, natural branded beef company, Laura's Lean Beef. Our family has a long history of beef cattle production. However, the commodity beef business has become increasingly challenging given the higher cost of production, tighter margins and wide variation in revenue from year to year. Our options were becoming limited. We saw a critical need to change the way we did business and become production specific, market oriented and sustainable in our overall approach to beef production.

Companies such as Laura's Lean Beef have provided that opportunity. By providing our consumer a lean, natural product they have asked for, Laura's Lean Beef has been to achieve phenomenal growth in the past decade. We see the partnerships formed between beef producers and Laura's Lean Beef to be viable and one of the few opportunities in sustainable agriculture. This partnership creates a fair, rewarding beef production system in which producers profit, Laura's Lean Beef profits and our consumers receive a high-quality beef product packed with value to serve their families.

Our main concern in the proposed ruling is: **Section 205.103. Use of terms or statements that directly or indirectly imply that a product is organically produced and handled.** Under this section, terminology is in question as implying beef is organically produced. This includes: No drugs or growth hormones used, raised without antibiotics, raised without hormones, no growth stimulants administered, ecologically produced, sustainably harvested and humanely raised. Under the proposed ruling, any company making claims such as these would be required to follow 100% organic production standards. Laura's Lean Beef and other such companies have made no claims that their product is organic and actually adhere to higher standards for a lean, natural product than the proposed new organic standards would create. Additionally, there is no doubt that we would not be able to produce beef cost effectively under the proposed organic standards due to the higher cost of feed, animals and compliance.

It is our belief that these regulations would stifle the free market and stop companies such as Laura's Lean Beef from delivering to our consumer the product they have requested. We have never tried to mislead the consumer into thinking we produce organic product. We produce beef that is lean and raised without antibiotics or growth hormones. These claims are communicated clearly to our consumer. We feel it is far more appropriate for USDA to enforce label claims rather than dictate what can be produced and what can be said on a product label. Thank you for your attention to our concerns.

Sincerely,

Warren Watt  
Select Supplier  
Laura's Lean Beef Company