



ACTION ALERT

Submit your comments supporting a 99% grass or forage fed standard that clearly prohibits feeding livestock conventional grain-based feed.

August 10th Deadline – Please respond now!

Your e-mail or letter is crucial to the approval of a strong 99% percent grass or forage feeding requirement for the USDA grass fed meat label claim. The general aim of the proposed 99% standard is to ensure that producers seeking to market their products with the grass fed label raise their livestock on diets that contain no significant amounts of grain.

The current proposed rule includes vague language that might result in misinterpretation of the rule, and allow producers to incorporate higher levels of corn and other mature grains into the diet of livestock intended to be marketed as grass fed. Fortunately, with some simple changes the standard can be clarified, and a sound rule with clear feeding requirements can be approved.

Submitting comments to the USDA urging them to clarify the kinds of grass and forage that livestock can be fed under the rule will help ensure that this rule does what it is intended to do—provide consumers with a grass fed label they can trust, and make certain the small and medium-sized farmers who have built this important market will continue to benefit from their dedication to the principles of sound land stewardship and animal welfare.

Comments should be addressed to:

- **Letters:** Chief, Standardization Branch, Livestock and Seed Program, AMS, USDA, Room 2607-S, 1400 Independence Avenue, SW., Washington, DC 20250-0254
- **Email:** <http://www.regulations.gov/fdmspublic/component/main>

All Comments should refer to Docket No. LS-05-09.

Key Points

(1) The proposed 99% percent grass or forage feeding requirement for livestock products labeled “grass fed” should be adopted, but with concise revisions that clearly lay out the definition of the kinds of feed permitted under the rule.

Specifically, the proposed rule would permit the feeding of “immature grain” that might be attached to silage or other forage, but does not provide description of the phrase. Possible differences in the interpretation of this broad term could result in the misapplication of an otherwise strong standard. Before moving forward with approval of this rule, USDA should revise the rule to prohibit the use of any mature corn or other

conventional grains in feedstock used by producers seeking to market products under the grass fed label.

(2) The USDA should immediately initiate a rulemaking, with public comment, for free range or pasture-raised livestock with the aim of finalizing a standard by the end of the year. Because pasture-based grazing is a fundamental aspect of grass fed meat production, it is crucial that use of these labels be made available to producers and consumers simultaneously. As USDA notes in its proposal, "...there is a synergistic nature to grass feeding and free range conditions ... (M)ost grass fed livestock will also qualify as free range livestock." However, not all free range systems receive their entire energy source from grass or forage and hence the need for two distinct and precise standards.

With grass fed and free range/pasture-raised finalized, USDA should then proceed to proposed label claims for no antibiotics used and no hormones added. With strong rules for each of these four label claims on the books, producers and consumers will benefit by being able to clearly identify the products they are raising and seeking to purchase.

Background

After three years of intensive consultations with a wide array of sustainable agriculture, environmental, and consumer interests, USDA's Agricultural Marketing Service (AMS) has released a revised proposal for a grass fed meat label claim for its process-verified labeling program. The revised standard, which applies to cattle, sheep and other ruminant livestock, but not pigs, requires that animals certified as "grass fed" receive at least 99 percent of their lifetime energy source from a grass or forage based diet. This is a significant increase from the original proposal issued in late 2002 stating that at least 80 percent of the lifetime energy source comes from a grass or forage-based diet.

The new proposed standard issued by USDA is in response to an effort led by the Sustainable Agriculture Coalition (SAC) to improve USDA's 2002 proposal for label standards for grass fed claims, as well as antibiotic use, hormone use, and free range claims. SAC developed a broad collaboration of interested parties to ask USDA for a more extensive and inclusive process that would allow input from family farm, consumer, humane, and environmental organizations and most importantly, sustainable livestock producers themselves.

Over the past decade, numerous scientific studies have shown that the meat and milk from grass and forage fed animals are higher in good fats that may confer health benefits on humans. The grass fed claim, in combination with strong standards for the other meat marketing claims still under consideration by AMS, will also help consumers identify meat products from animals raised in pastured systems that lessen environmental damage and improve animal health.

SAC demanded that the USDA develop a grass-fed label that helped, not hindered producers who were already maintaining a 100 percent grass fed operation, and not destroy the market by allowing large confined feedlot operations to finish out the animals on a grain-based diet and still make claims to being grass fed. SAC endorses a strong 99 percent standard that would ensure these long-standing principles are certain to be met.

Please help secure the approval of a strong 99 percent standard, and help ensure the quick approval of a labeling claim for free-range or pasture based livestock!

Respond by sending a brief comment letter, by email or snail mail, to USDA before August 14, 2006.

A sample comment letter follows. Feel free to adapt it and to add whatever other comments you may wish to make about the proposed standard.

Thank you!

SAMPLE LETTER

<Date>

Chief, Standardization Branch
Livestock and Seed Program, AMS, USDA
Room 2607-S, 1400 Independence Avenue, SW
Washington, DC 20250-0254

RE: Proposed Rule for the United States Standard for Livestock and Meat Marketing Claim, Grass (Forage) Fed Claim published in the Federal Register on May 12, 2006
[Docket No. LS-05-09]

I am writing to provide comment on the proposed rule for the United States Standard for Livestock and Meat Marketing Claim, Grass Fed Forage Claim. I support the approval of a strong 99 percent grass fed standard. While the proposed grass fed rule currently being considered by the USDA is clearly intended to ensure that animals certified as grass fed receive a minimum of 99 percent of their lifetime energy source from grass or forage, clarification of the rule is needed to guarantee this standard is met.

Specifically, the language of both the proposed rule and background information should more explicitly define the term "immature grain," with the goal of eliminating any possibility that feed harvesting or stockpiling methods that might include significant amounts of grain could potentially be approved under the standard. Although this is a relatively simple clarification, this change is essential to ensuring the spirit of the rule is translated into actual practice, and that consumers and producers can put their trust in the grass fed label.

In conjunction with this change, I strongly urge your office to move forward quickly on developing requirements for labeling claims related to pasture requirements, hormones, and antibiotics. Of particular importance is fast action on a free range or pasture-based labeling claim. Because the maturation of livestock in free range conditions is a fundamental aspect of grass fed production, it is essential that the free range label be made available at the same time as the grass fed label. For this reason, I encourage your office to complete this additional rulemaking within the next several months, so that both process verified programs can be implemented simultaneously early next year, followed soon thereafter by the no antibiotics used and no added hormones label claims.

Sincerely,

<Name>

<Address>