

Bell&Evans

March 1, 2007

Dr. Robert C. Post
Director, Labeling and Consumer Protection Staff
Food Safety and Inspection Service, USDA
1400 Independence Avenue, SW
Suite 602 Annex
Washington, DC 20250

We had the opportunity to participate in the Public Meeting regarding review of the definition of the term "Natural" as it pertains to product labeling. We wish at this time to take the opportunity to express our views as provided by the open comment period for interested parties.

Bell & Evans is a slaughter facility located in Pennsylvania. In 1998 we switched our grow-out operation to the production of 100% of our flocks to a raised without antibiotics, vegetarian fed production method. In addition to these claims, we also use the term "all natural" as part of our labeling and advertising information.

We believe ourselves to be one of the largest, most experienced companies in this segment of the industry. Communication with our consumers continues to reveal that they read much more into the term "all natural" than is currently warranted. The vast majority of our consumers (87%) who communicated with us in 2006 on this subject directly tied the use of hormones and antibiotics with the term "all natural". A lower, but still significant number (58%) of consumers specifically related growth practices to the use of the term.

A reputable company, which we pride ourselves on being, takes the time with each consumer to clarify the use of the terms and stress the true meaning of the "all natural" moniker. We explain the importance of our other claims and what they truly indicate with regard to our growing practices. A less reputable company will allow consumers to assume that the "all natural" term indicates far more than it truly does.



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The current review of the term provides FSIS with the unique opportunity to strengthen an existing term to more closely match the consumer interpretation of the term.

We recommend that FSIS take serious consideration to strengthen the requirements for use of the term "all natural", that you limit the use of this term to meat and poultry products that meet specific ingredient and processing requirements which are strictly outlined and that you specifically tie the use of the term to meat and poultry which are raised under strict standards including the prohibition of antibiotics and hormones.

We believe that a fresh look at the term and a final decision to bring the term into better context with consumer expectations will best serve the public. Thank you for your consideration.

Regards,



Scott I. Sechler
President

