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Perdue Farms Incorporated  
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www.perdue.com

January 4, 2007

FSIS Docket Room  
Docket Clerk, USDA, FSIS  
300 12<sup>th</sup> Street, SW  
Room 102  
Cotton Annex  
Washington, DC 20250

**RE: Perdue Farms, Inc Point of View on "Natural" Labeling of Meat and Poultry Products**

We applaud FSIS for its desire to clarify labeling of "Natural" products. Perdue Farms, Inc. agrees with the need to eliminate consumer confusion in the meaning of "Natural" as applied to poultry products.

The current definition of "Natural" in labeling of meat and poultry products is vague. Exceptions and nuances of policy interpretation have resulted in a confusing landscape for consumers to navigate. Clarification of the "Natural" definition will enable FSIS, consumers, manufacturers, and retailers to operate on the same level playing field.

In the future we believe that "Natural" should constitute two labeling categories:

1. Where "Natural" is associated with the product name, no other ingredients will be permitted beyond the meat of origin. For example, Natural Chicken Breast could not be marinated, injected, seasoned, or otherwise enhanced.
2. Where ingredients deemed as natural themselves are used in formulation of products a labeling claim such as "Made with All Natural Ingredients" or "Enhanced with All Natural Ingredients" should be permitted. In this category any natural ingredient will be allowed but it is imperative that 100% of the ingredients used are considered natural.

Sincerely,

David H. Owens  
Vice President of Research and Development



A Family Commitment to Quality Since 1920™