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P.O. Box 150 Watkins Glen, NY 14891 607-583-2225  
P.O. Box 1065 Orland, CA 95963 530-865-4617

January 10, 2007

FSIS Docket Room,  
Docket Clerk, USDA, FSIS,  
300 12th Street, SW.,  
Room 102  
Cotton Annex  
Washington, DC 20250.

RE: Docket No. FSIS 2006-0040  
Product Labeling: Definition of the Term ``Natural'

To Whom It May Concern:

Farm Sanctuary, the nation's leading farm animal protection organization, submits the following comments regarding Docket No. FSIS 2006-0040. Specifically, Farm Sanctuary asks that the suggestions outlined in the petition submitted by Hormel, Inc. regarding the labeling of meat products as "natural" be expanded to encompass the treatment and living conditions of animals raised for food prior to their slaughter. In particular, we oppose the use of the "natural" label to apply to meat products obtained from animals raised in intensive confinement systems, or whose lives have been otherwise altered and manipulated in blatantly unnatural ways.

We agree with Hormel and others who have noted that the existing "natural" label is confusing and misleading to consumers. In light of increasing consumer interest and concern about how farm animals are raised prior to being slaughtered, we urge the FSIS to expand the parameters under consideration to include the animals' living conditions. Growing societal concern and opposition to housing farm animals in cruel, intensive confinement was apparent last November, when 62% of Arizona voters approved Proposition 204 to prohibit the use of veal crates and gestation crates, 2-foot-wide enclosures that confine calves raised for veal and sows who are used for breeding.

As the industrial animal farming system proliferates, public concern mounts for the welfare of animals subjected to factory farming. Farm Sanctuary submits that the public's growing interest in such matters dictates that public concerns about animal treatment trump narrower perspectives of post-slaughter meat processing as the sole basis for considering what defines "natural".

Certainly, meat from animals that are raised completely indoors, deprived of living space and stimulation appropriate to the species, does not fit most consumers' expectations of a "natural" product, regardless of how the meat from the animal is processed after its slaughter. To this end, a nationwide Zogby poll of 1,013 likely voters, conducted from January 5 through January 9, 2007, found more than 70% consider it "inappropriate" to label meat, milk or eggs from animals raised in intensive confinement systems as "natural". The poll also showed that a majority of consumers prefer to purchase foods labeled as "natural" over those without such a label.

Large scale, industrialized production systems subject animals raised for food to severely crowded, barren and unhygienic environments that precipitate various physical and psychological ailments. Out of ethical concerns, and in consideration of consumers who often choose meat labelled "natural" for humane reasons, the term "natural" should not be defined in a manner that permits animals marketed under the label to be treated in a manner that prevents them from engaging in basic natural behaviours and is detrimental to their welfare. The "natural" label implies a higher standard of raising animals, and the USDA FSIS should ensure these standards are met.

Currently, chickens and turkeys sold as "natural" have been genetically altered to grow twice as fast and twice as large as normal, which causes the birds to suffer health problems related to the inability of their hearts and lungs to support their extreme growth rates. They also suffer leg and joint disorders because their legs are unable to support their abnormal weight. In the case of turkeys, the birds have been so profoundly altered that they cannot even mount and reproduce naturally. The birds are also packed by the thousands in warehouse like factories, unable to experience natural outdoor environments or fulfill their basic instincts.

Pigs, like poultry, are crowded into unnatural indoor environments for the duration of their lives. They stand on slatted metal or concrete floors in warehouse-like factory farms. Cattle raised for beef also spend much of their lives confined in overcrowded feedlots.

Cattle, poultry and pigs are all given unnaturally rich diets designed to maximize production and economic profitability, and they are routinely given antibiotics to ward off disease, as well as to increase growth rates. Calves raised for veal are purposely denied solid food, which prevents their digestive systems from developing normally, and cattle raised for beef are routinely given hormones to expedite their growth. Ducks and geese raised for foie gras (French for "fatty liver") are force fed with a pipe that is shoved down their throats, which causes their livers to expand ten times their normal size.

Animals subjected to crowded and unnatural living conditions are prevented from developing a natural social order and interacting as they would if provide more spacious, enriched environments. In the absence of appropriate, healthful living conditions and social interactions, animals can be driven to engage in abnormal, frustration-induced, aggression. To stave off the resulting injuries, cattle are dehorned, turkeys have parts of their beaks and toes cut off, and pigs have their tails docked. These mutilations are performed without anesthetics.

Male mammals, including cattle and pigs, are routinely castrated without pain killers to maximize production related goals with no regard for the animals' welfare. In the case of pigs,

the procedure is supposed to prevent what is called 'boar taint', a pungent, natural odor that the pork industry prefers not be in the meat.

None of the aforementioned situations, all of which are common and currently allowed under the "natural" label, comply with the average consumer's expectation of what is behind the "natural" label.

### **Recommendations:**

In the interest of upholding truth in labeling standards and in protecting consumer confidence in labeling, we ask that meat products derived from any animals raised under conditions inconsistent with their natures to be excluded from the "natural" label. This would include pigs, cattle and birds who are raised in systems that prevent the expression of behaviors innate to the species, and who are forced to consume diets that are inconsistent with the animals' natural biological function. If such conditions cannot be met, the "natural" label should not be allowed.

Additionally, the routine use of hormones, and the dosing of animals with antibiotics, both as a means to ward off diseases that run rampant in intensive confinement facilities and to accelerate the animals' growth rates, is inconsistent with the general consumer's understanding of natural. This widespread, non-therapeutic antibiotic administration not only threatens the health of the human population by giving rise to "superbugs," or antibiotic resistant bacteria, but it represents a betrayal of consumer expectations regarding the "natural" label, since the routine ingestion of large amounts of antibiotics would never occur in a natural setting.

We request these stipulations be implemented in regards to the "natural" label, because, we feel that to do otherwise would define the term in a manner that differs from public perception and will mislead consumers. In the absence of such guidelines, which would require significant reforms in current animal rearing practices, we believe use of the 'natural' label should be discontinued.

Thank you for your attention and concern.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gene Baur', with a long horizontal line extending to the right.

Gene Baur, President  
Farm Sanctuary, Inc.