



FOOD ANIMAL CONCERNS TRUST
411 W. FULLERTON PARKWAY, #1402W
POST OFFICE BOX 14599
CHICAGO, ILLINOIS 60614

January 11, 2007

FSIS Docket Room
United States Department of Agriculture
300 12th Street, SW
Room 102 Cotton Annex
Washington, DC 20250

Submitted via email (fsis.regulations@fsis.usda.gov)

Re: Docket No. FSIS 2006-0040, FSIS Product Labeling: Definition of the term
“Natural”

Dear Sir or Madam:

Food Animal Concerns Trust (FACT) appreciates this opportunity to submit comments regarding Docket No. 2006-0040, FSIS Product Labeling: Definition of the term “Natural.” FACT is a non-profit organization that promotes better methods of raising livestock and poultry by improving the welfare of farm animals, increasing the safety of meat, milk and eggs, broadening economic opportunities for family farmers and reducing environmental pollution.

Increasingly consumers want to make informed choices when they go to the supermarket, but to do so they need meaningful and unambiguous food labels. The labels also need to be consistent among the various brands—both in how they are defined and in how they are perceived. FSIS’s definition of ‘natural’ as it applies to meat and poultry products is inconsistently implemented, ambiguous in its definition, and not meaningful to the general public.

FACT calls upon the agency to consider the ‘natural’ label within the larger context of value-added labeling initiatives. If ‘natural’ continues to be approved for use on meat and poultry packaging, the term should be consistent across all divisions of USDA, including the Agricultural Marketing Service (AMS). FSIS’s ‘natural’ label applies solely to processing and added ingredients and does not consider the husbandry and production practices used to raise food animals.

FACT believes that USDA should have only one natural meat label and that this label should be comprehensive in its scope, covering food animal production from conception to consumption. Consumers of meat and poultry products are generally not aware that ‘natural’ applies only to the post-slaughter processing of an animal; most assume it also describes how an animal was raised. The ‘natural’ label as it currently stands is blatantly

misleading to consumers and should be revised to encompass the methods used to raise, slaughter and process an animal.

If such a revision is not possible in the near term, FACT asks that FSIS consider changing its 'natural' label claim to 'naturally processed' or 'minimally processed,' keeping in-line with the implied meaning of the label.

FSIS is tasked with ensuring that meat, poultry, and egg product labeling is truthful and not misleading. To adequately implement its mission, the agency needs to thoroughly consider all aspects of the use of the term 'natural' through collaboration with AMS, consumer and sustainable agriculture organizations, and farmers. FACT will gladly provide additional input if there is an opportunity to do so in the future.

Thank you for your consideration of our comments.

Submitted by:

Larissa McKenna
Associate Director, Food Animal Concerns Trust

Richard Wood
Executive Director, Food Animal Concerns Trust