



Naturally Raised Marketing Claim
Room 2607-S
Agriculture Marketing Service
United States Department of Agriculture
1400 Independence Ave SW
Washington, D.C. 20250-0254

Re: Docket No. AMS-LS-07-0131; LS-07-16

Dear Sirs:

On behalf of the family farmers and ranchers of National Farmers Union (NFU), I am pleased to submit comments in response to USDA's proposed voluntary standards for a naturally raised marketing claim. American farmers and ranchers are proud to produce the high-quality and nutritious food products that consumers want. A soundly designed and well implemented standard for naturally raised products would help connect consumers with the products they desire and give producers the opportunity to add value to their products.

Given the realities of today's global economy, continued concentration in agricultural markets and the small return producers receive from the consumer food dollar, value-added agriculture remains an important tool for producers to increase profitability. Certifying a product as naturally raised would give producers leverage to get a higher price for producing a niche product.

Consumers increasingly want to know more about the products they purchase for their families. Many are willing to pay more for products grown or raised under certain conditions. However, consumers must rely on unregulated marketing claims, making it difficult to determine the validity of a claim. A naturally raised label would give consumers an additional tool to help them make informed purchasing decisions.

A well designed and administered program would benefit both producers and consumers. However, an ineffective or poorly run program will diminish consumer confidence, burden producers and tarnish the naturally raised label. The following concerns must be addressed in order to create a program that benefits both producers and consumers:

- A voluntary standard must not be financially burdensome to producers. The proposal put forth by AMS does not address the cost to producers who wish to verify their products as naturally raised. Family farms operate with slim profit margins and might not have the resources to meet costly compliance standards. An effective program must consider the unique nature of family farms to ensure any willing program participant would not be economically disadvantaged from enrolling or meeting the standards.
- Monitoring and enforcement must be done in a way that does not encumber producers. Family farmers should not be forced to comply with complicated or gratuitous regulations. It is unnecessary for producers who already raise natural products to significantly change their production practices to participate in the program.
- The requirements of the program must be strictly enforced. A naturally raised standard will only be effective if consumers trust the label. Proper enforcement is key to assuring consumers that products meet the high standards implicated by the naturally raised label.

- The program must be transparent and easy for consumers to understand. Consumers are inundated with marketing claims, making it difficult to determine how a product was actually produced. In order to gain consumer confidence, naturally raised standards and the label itself must be clear and understandable. The Food Inspection Safety Service (FSIS) of USDA has a definition of ‘natural’ that is used to identify products under their authority and this could cause confusion among consumers.
- Products should be regulated from farm to table. The proposed program requires the production of animals to meet natural standards but does not regulate processing of the animal products. A consumer who chooses to purchase a product that is naturally raised should know the product has not undergone processing, such as the addition of carbon monoxide, which is not generally considered “natural.”

The creation of a voluntary standard for a naturally raised marketing claim would provide consumers with information they demand, and provide an opportunity for producers to increase profitability. In order for such a program to be effective, it must be properly administered to ensure gains accrue to both producers and consumers. I urge you to consider the concerns listed above as you move forward with this proposal and implement a program that is beneficial to all parties.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Buis". The signature is fluid and cursive, with a large initial "T" and "B".

Tom Buis, President
National Farmers Union