



# Animal Welfare Institute

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January 30, 2008

Naturally Raised Marketing Claim  
Room 2607-S, AMS, USDA,  
1400 Independence Avenue, SW  
Washington, DC 20250-0254

Re: Docket Number LS-07-16

Dear Sir/Madam:

The Animal Welfare Institute (AWI) is pleased to have the opportunity to submit comments on the content of the proposed “naturally raised” marketing claim for animal food products.

The current proposed United States Department of Agriculture (USDA) Agricultural Marketing Service (AMS) definition of “naturally raised” as applied to a food product from animals is:

*Naturally Raised--Livestock used for the production of meat and meat products have been raised entirely without growth promotants, antibiotics, and have never been fed mammalian or avian by-products. This information shall be contained on any label claim that an animal has been naturally raised.*

This definition, if applied to the term “naturally raised” is erroneous and disingenuous. The term “naturally raised” carries the accurate implication that animals grown under the label claim have been provided *environments* and *management* that are consistent with the natural histories of their species throughout their lifetimes. However, the proposed standard claim applies only to how the animals have been fed and what substances have been administered to them. It could apply to any rearing conditions, including the most “unnatural” of rearing conditions – industrial rearing practices in total confinement.

Suggested language for revised label claim:

*Naturally Raised--Livestock used for the production of meat and meat products have been raised entirely without growth promotants or other agents, including beta-agonists, ractopamine, and hormones administered to artificially increase meat yield, routinely synchronize estrus, or increase muscle mass in animals raised for meat, or antibiotics to control rather than treat disease, and have never been fed mammalian or avian by-products. In addition, animals raised under this claim have been bred, ranged, fed, housed, and handled in a manner compatible with the natural history and biological and behavioral needs of their species and in a manner consistent with their age.*

## AWI'S RATIONALE FOR THE SUGGESTED REVISIONS:

Comments on USDA-AMS Reasons for Proposed Definition

USDA asserts that “prohibiting use of antibiotics, growth promotants, and certain animal by-products are the main attributes consumers want for ‘naturally raised’ meat and meat products.” We respectfully disagree with this assertion.

Consumers, including conscientious consumer members of our own organization, have a very different picture in mind when they see the term “naturally raised” applied to the options available for their food purchases. This was clearly demonstrated in the results of a poll conducted by the *Consumer Reports* National Research Center this past summer. The report revealed that 83% of those polled regarding meat labels said a “natural” label should mean “it came from an animal raised in a natural environment.” Please see page 15 of the report at the web address: ([http://greenerchoices.org/pdf/Food%20Labeling%20Poll-final\\_rev.pdf](http://greenerchoices.org/pdf/Food%20Labeling%20Poll-final_rev.pdf)).

In the proceedings of Naturally Raised Livestock and Meat Marketing Claim Listening Sessions, Mr. Sessions (January 17, 2007, Denver) and Mr. O'Connor (January 18, 2007, Seattle) acknowledged, respectively, in bold:

“... research ... indicates ... **[s]ome customers also want be to assured that the meat and poultry marketed as 'naturally raised' comes from animals that have not been fed animal byproducts, have been raised on a vegetarian diet, have lived under free-range conditions, and have been raised with careful regard to animal welfare concerns....**”

And,

“there is a growing concern and/or query from the consumer or the marketplace itself that not only is there a concern or an interest in how the meat product itself is processed, but there is interest in the raising of that animal and bringing it to the marketplace.... **what was the environment that it was produced in.** What are the production practices that would fall within a naturally raised claim? **Some of the initial initiatives that people provided to us were the environment, the ration that the animal is fed, and the health and maintenance of that animal....**”

Moreover, in the listening sessions, many ranchers, farmers, and others, including food retailers, testified in the public meetings organized by USDA/AMS that the ability to range freely, eat diets natural to their species, and engage in natural behaviors are essential aspects of a “naturally raised” claim. Many ranchers and farmers described their own rearing practices, which encompassed a broader definition of naturally raised that included humane care as well as free-range and other environments consistent with the biological and behavioral needs of the animals. We are concerned that in distilling the public comments, USDA/AMS has not given sufficient weight to the testimony of those who, in some cases representing sizeable consumer constituencies, asked that the definition encompass more than substances fed or administered to the animals and include, as well, whether the animals experienced a lifetime of good physical and psychological care in surroundings that supported their biological and behavioral needs.

## Food Safety

While we recognize that food safety (and hence substances fed to or administered to animals) is a major concern of the Food Safety and Inspection Service (FSIS), we note that the conditions under which animals are raised also have food safety implications and so it is highly appropriate to expand the current proposed definition to include these environment- and care-and-management-related criteria. For example, it is recognized that pasture-raised cattle and cattle fed on forage rather than high content grain diets are substantially less likely than feedlot-raised, grain-fed cattle to harbor or shed the numbers of E-coli that have led to debilitating illnesses and sometimes the deaths of consumers who unwittingly ate pathogenic E-coli contaminated food products.<sup>1</sup>

In another study, 58% of cattle raised in a feedlot carried campylobacter, while campylobacter was carried by only two percent of cattle raised and finished on pasture.<sup>2</sup>

In a Swedish study, pasture-raised calves tested for presence of E-coli O157:H7 showed none while at least one barn-raised calf tested positive for the pathogen.<sup>3</sup>

Similar results have been obtained for other livestock species. For example, pigs kept in low-stress environments that are more compatible with their natural behaviors than intensive confinement conditions shed fewer pathogens in the feces than stressed pigs.

We note our concern that the prohibition on the use of antibiotics to treat “naturally raised” animals that have gotten antibiotic-susceptible bacterial infections or illnesses will cause some farmers and ranchers to withhold treatment to individuals whose suffering would be relieved by treatment in an effort to maintain the antibiotic-free status proposed under the “naturally raised” claim (potentially resulting in a higher price for the end product in the marketplace). We believe this could result in unnecessary animal suffering, if included in the definition of naturally raised and note that it is the routine, low-dose administration of antibiotics to control disease and promote growth that leads to antibiotic resistance among pathogenic bacteria strains and that the prohibition could lead to a larger number of sick animals being sent to market which is not consistent with animal or consumer safety and welfare. We propose that antibiotic treatment of individuals be permitted under the claim, if and only if prescribed by a veterinarian under strict guidelines that have been carefully and thoroughly spelled out by FSIS and only after other, non-antibiotic remedies have failed to relieve the animal’s suffering. We further believe that if management and environment are consistent in all other respects with the biological and behavioral needs of the animal, infections, illnesses, and disease should be rare.

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<sup>1</sup> Russell, J. B., F. Diez-Gonzalez, and G. N. Jarvis. Potential Effect of Cattle Diets on the Transmission of Pathogenic Escherichia Coli to Humans. *Microbes Infect* 2, no. 1 (2000): 45-53.

<sup>2</sup> Bailey, G. D., B. A. Vanselow, *et al.* (2003). A study of the food borne pathogens: Campylobacter, Listeria and Yersinia, in faeces from slaughter-age cattle and sheep in Australia. *Commun Dis Intell* 27(2): 249-57.

<sup>3</sup> Jonsson, M.E. *et al.* Persistence of Verocytotoxin-Producing Escherichia Coli O157:H7 in calves kept on pasture and in calves kept indoors. *Int. J Food Microbiol* 66, 1-2 (2001): 55-61.

## Animal Welfare

The standard behind the claim “naturally raised” must include clear emphasis on raising animals in environments and under management protocols that are consistent with the natural histories of the species to whose products the claim applies. That consumers share this concern is also the opinion of highly respected animal welfare scientists here and abroad. For example, Fraser, et al. (1997)<sup>4</sup> note three overlapping ethical concerns expressed by the public over how food animals are raised:

- 1) Animals should lead natural lives through the development and use of their natural adaptations and capabilities;
- 2) animals should feel well by being free from prolonged and intense fear, pain, and other negative states and by experiencing normal pleasures; and
- 3) animals should function well in the sense of satisfactory health, growth and normal functioning of physiological and behavioral systems.

AWI believes these three overlapping ethical concerns more accurately represent the true interests of the consumers of animal products in a marketing claim termed “naturally raised” than does the currently proposed definition.

Animal health and food safety are directly related to the environmental and management conditions under which animals are raised. Animal welfare (how an animal “fares”) directly impacts human welfare and recognizing this is consistent with a “naturally raised” label claim. Rapid changes in animal agriculture over the past 50 years have far outpaced the natural capabilities of animals to adjust to the changing environments and production demands made of them, taxing and, increasingly, overcoming their abilities to cope, related to a growing panorama of man-made, production-related diseases. As well, animals artificially selected for high product yields and rapid growth have suffered from reduced emphasis on selection for physical soundness and reproductive ability. The results are, not surprisingly, an increase in the incidence of diseases, injuries (e.g., to hooves or bones), the food safety issues mentioned above, and alienation of conscientious consumers from the food industry. Developing a meaningful, accurate, and transparent “naturally raised” label claim that encompasses the philosophy and practice of bringing animal rearing and selection practices into line with the natural capabilities and histories of food animals, gives the agriculture industry, and particularly, farmers and ranchers distinguished by a humane ethic who already are following such practices, an opportunity to restore the public trust in American food products, regulatory responsibility, and the conscientious practitioners in the farming and ranching sector.

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<sup>4</sup> Fraser, D., Weary, D.M, Pajor, E.A., & Milligan, B.N. (1997). A scientific conception of animal welfare that reflects ethical concerns. *Animal Welfare*, 6(3): 187-205.

Suggested components of an appropriately defined “naturally raised” claim not present in the proposed definition<sup>5</sup>

1) Genetic selection. At a minimum, animals under this claim should be capable of self-reproduction without human intervention. This is not currently true of conventionally bred and raised turkeys. Other highly selected animals experience difficulty in giving birth (double muscled cattle bred for meat yield which frequently require cesarean section to give birth) and reduction in fertility and ability to become pregnant (dairy cattle breeds and strains highly and sometimes exclusively selected for milk output). On farms under the “naturally raised claim” animals should be kept who have been selected for a wide range of characteristics contributing to their health and wellness. Selection for yield and growth rates should be secondary to selection for health and wellness.

2) Management and environment. Both management and environment must respect the species characteristics of each animal, e.g., in terms of differing flight responses, need for social contact, temperature needs, space needs, and nutritional needs for healthy digestion and status.

a) Diet adequate and appropriate for the species. For example, cattle, which are primarily grazers, often suffer rumen acidosis from starchy diets high in ground feed and lacking in forage, including dry hay. Rumen acidosis contributes, in turn, to lameness, by producing poisons that attack small blood vessels between the claw capsule and the bone underneath it. These blood vessels that supply the horn-producing tissues then expand and increase the pressure inside the claw and cause discomfort. Damage to the blood vessels causes clots to form, in turn, reducing the blood supply to the horn-producing tissues, producing horn that is softer than normal. Diets lacking in sufficient forage are common on feedlots, but forage, including dry hay are usually plentiful on grazing farms.

Or, for example, 10 to 15% of the calcium in a hen’s body goes into an egg. If the nutrients provided to laying hens are not adequate to replenish medullary bone from which calcium for eggs is taken, calcium is taken from bones needed for structure, contributing to osteoporosis and bone breakage before slaughter.

b) Housing and environment. All animals under this claim must have meaningful access to the outdoors and an enriched housing environment, meaning an environment that provides functional feedback consistent with the natural histories of their species. Under this criterion, an animal must have the space and materials to engage in behaviors that are critical to the species. For example, the single strongest instinct of the sow is to build a nest in which to farrow her young. Her behaviors of nest site seeking and selection, materials gathering and placement, and lying down to farrow are driven by specific hormonal changes within the last 72 hours prior to farrowing. For a sow it is not a choice to build a nest but a behavior compelled by internal factors. Consequently, without the space or materials to build a nest, the sow does not have the functional feedback for normal delivery. To be deprived of the opportunity to engage in this behavior is highly stressful to the sow and can result in excessive restlessness or, without an

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<sup>5</sup> See as reference for this section Halverson, M., et al. (2002). Farm Animal Health and Well-Being: Technical Working paper on animal health of the State of Minnesota Generic Environmental Impact Statement on Animal Agriculture. [http://www.eqb.state.mn.us/geis/TWP\\_AnimalHealth.pdf](http://www.eqb.state.mn.us/geis/TWP_AnimalHealth.pdf)

external intervention such as administration of oxytocin, in delayed births that put the lives of her offspring in jeopardy. There is a vast scientific literature on the housing and environmental needs of the various farmed animal species that can substantiate the scientific basis for additional requirements for housing and environment that a “naturally raised” label claim should imply.

4) Care and management. Naturally raised should imply an emphasis on preventive veterinary care to avoid injuries, illnesses, infections, and the results of nutritional deficiencies. Interventions by the stockperson should be primarily positive in nature and geared toward providing comfort, adequate nutrition, opportunities to safely engage in behaviors normal to the species, maintaining hygienic and safe facilities, equipment, and keeping outdoor ranges in good condition, with materials for grazing, foraging, browsing, as appropriate for the farmed animal (including birds) species.

For this purpose, we believe the following minimum requirements stated by the United Kingdom’s Farm Animal Welfare Council, as elaborated on the AWI Animal Welfare Approved website (<http://www.animalwelfare.com/farm/fivefreedoms.htm>), are the minimum requirements with respect to care and management that should be encompassed in a “naturally raised” label claim:

a) Freedom from hunger, thirst, and malnutrition, implying providing ready access to fresh water, a diet to maintain full health and vigor (including full feed during lactation); and, in situations where animals are limit-fed grains or grain-based feeds, making edible materials such as straw or grass hay continuously available to satisfy animals’ hunger between feedings (including ‘behavioral’ hunger);

b) Freedom from physical and thermal discomfort providing a suitable environment, including shade, shelter, and a comfortable resting area;

c) Freedom from pain, injury, and disease (including parasitical infections) by proper, holistic veterinary care including preventing and rapidly diagnosing and treating disease and injury; vaccinating where necessary; maintaining proper pasture rotations to minimize parasitical infection; immediately euthanizing animals when treatment would be ineffective or would cause an extended period of suffering (e.g., broken limbs); never transporting injured or diseased animals, or animals in a late stage of pregnancy, except to a veterinary clinic for diagnosis and treatment designed to benefit the animal (i.e., never transporting such animals to slaughter or to other destinations where the endpoint is slaughter);

d) Freedom to express normal behavior, by satisfying minimal spatial and territorial requirements including a visual field, ‘personal’ space, and company of the animal’s own kind; and

e) Freedom from fear and distress by ensuring conditions that avoid causing distress and mental suffering, through items 1-4 as well as by grouping compatible animals (e.g., to prevent bullying) and by humane handling.

3) Transport and slaughter. Respect species characteristics in load density and method of transport as well as care and humane concern in loading, driving, stopping, and unloading. Properly stun and render animals insensible according to species characteristics (e.g., captive bolting, if practiced, should be placed in the proper head positions which differ between species, and size and weight must be taken into consideration when pigs are being stunned prior to processing). Require adherence to American Meat Institute guidelines for humane handling of animals destined for slaughter, found at <http://www.animalhandling.org/>.

Thank you for the opportunity to comment on the “naturally raised” label claim definition.

Respectfully submitted,

A handwritten signature in blue ink that reads "Cathy A. Liss". The signature is written in a cursive style with a large, stylized "L" at the end.

Cathy A. Liss  
President