



October 30, 2019

Office of Policy and Program Development
Food Safety Inspection Service
United States Department of Agriculture 1
400 Independence Avenue, SW
Washington, D.C. 20250

Re: Petition Number 19-04

Superior Farms, is the recognized leader in the retail and foodservice markets it serves, providing American lamb products and services to customers throughout the United States and more than 10 countries. We employ approximately 400 employee-owners at its nationwide network of facilities and offices. Superior Farms is an employee-owned company whose members take pride in their individual roles and contributions to the company's success, which includes providing our customers with a safe and wholesome product.

This letter expresses our strong concerns and **opposition on petition number 19-04** submitted on September 5, 2019 by the Lamb Company (petitioner). Superior Farms is the largest processor of American lamb and utilizes the agency's definition of "spring lamb" or "genuine spring lamb" in 9 CFR 317.8(b)(4) as a valuable marketing tool for lamb sold in March to October.

Superior Farms has used the definition of "spring lamb" and "genuine spring lamb" for decades, and have invested significant resources to develop marketing programs and consumer trust when purchasing lamb with these statements. The definition accurately depicts spring lamb based on the U.S. seasonal production of lamb, and supplies the market at a peak time of year - Easter. The elimination of the definition from FSIS will ultimately lead to confusion in the market place and degrade the trust and perceived quality of lamb that falls within this program. Ultimately, placing a negative impact on the American lamb producer.

Superior Farms strongly encourages FSIS to reject the petition number 19-04. The petition will only allow for foreign competition to gain a larger percentage of market share, and further diminish the US. lamb industry. The petition is more about achieving higher sales for an individual, foreign based company rather than to improve government efficiencies and improvement of the American lamb industry and ultimately take advantage of the marketing that has been deployed for this program through the years.

Sincerely,

Lesla Eidman
Director of Producer Resources and Sustainability