



NC Choices' New Grass Fed Beef Labeling Q&A

Many of you have asked questions about the new AMS change to withdraw the voluntary marketing claim standard, Grass (Forage) Fed, and the Naturally Raised Marketing Claim Standard. To help address some of your questions, NC Choices has put together a brief set of questions and answers on the Grass fed Label change. It is important to remember that labeling approval occurs either on the state or federal level. The plant inspection status will determine if the approval application is submitted to the state or federal level. The USDA AMS' withdraw of the standard will not impact the label application process for either state or federal labeling divisions. Additional questions and answers below.

Question: Why did AMS withdraw the standard?

Answer: AMS withdrew their standard because they felt it was out of their jurisdiction to develop marketing claims. They also state the withdrawal was meant to reduce confusion that was caused by one branch of USDA (AMS) developing a marketing claim standard for grass fed and another branch of USDA (FSIS) approving the claim. *View the recent USDA blog for more info <http://blogs.usda.gov/2016/01/20/understanding-ams-withdrawal-of-two-voluntary-marketing-claim-standards/#more-62759>*

Question: Does this change impact the label approval process in any way for producers wanting to add grass fed to their label?

Answer: No. USDA FSIS will continue to review label claims as they have always done. USDA AMS' decision to pull their ownership of the standard will not change FSIS' label approval process.

Question: Does this AMS change mean I have to do additional work as a grass fed farmer?

Answer: No, not likely. If you did cite the AMS standard in your label application, you can update the application on file with your processor by simply removing (or crossing out) the words "AMS" and adopting the standard as your own. You don't need to resubmit any revised paperwork to FSIS.

Question: My beef was verified as grass fed by AMS within the USDA Small and Very Small Producer Program. Do I need to do anything?

Answer: No, no action is necessary for producers who received their grass fed claim approval as participants in the Small and Very Small program.

Question: When FSIS reviews grass fed claims, what is the approval criteria when reviewing documentation?

Answer: FSIS only approves grass fed claims from animals that are fed a diet from 100% grass after it has been weaned from its mother's milk. If the animal is fed any grain during its lifetime, FSIS will permit the words "grass finished" to be used as long as it is accompanied by the % of grass to grain. So, for example, FSIS may approve a label that reads, "grass finished 80% grass/20% grain". FSIS will review farm documentation and standards supporting the 100% grass fed claim and determine if they meet that criteria. It is important to note, FSIS does not require third party certification for claims.

Question: What if a farm wants to ensure that their grass fed label is audited by an outside party?

Answer: If a farm wants to ensure that their grass fed claim is audited by an outside party according to a set of published protocols, many farms elect to use voluntary third party certified agencies, such as American Grassfed, Animal Welfare Approved grass fed, or Global Animal Partnership. If a farm wants verification of the grass fed claim that was

not overseen by a third party auditor, they could request that AMS audit and visit their farm. AMS does conduct audits for claims (including their former grass fed standard) upon request.

Question: Why is this raising questions in the local food sector?

Answer: The grass fed claim is a ‘voluntary’ claim and therefore has always been subject to different definitions in the marketplace. FSIS has never required farms to use a third party verified claim or adhere to the former AMS’ standard of grass fed. However for many, the USDA AMS standard of grass fed represented a set of vetted industry protocols for the grass fed label, which could be used in its entirety or modified by farmers submitting their own grass fed claims. While the standard still exists, concerns have been raised that by removing USDA’s association with the standard, farms and businesses may lose a baseline definition adapted by many in the grass fed industry, leaving room for more creative definitions of 100% grass fed and more confusion in the marketplace.

Others argue that rather than just getting rid of the AMS’ ownership of the standard, FSIS *should* have a standard for the grass fed claim (either by adopting the AMS standard as the required protocol or developing a new set of protocols) in order to reduce confusion and protect the integrity of grass fed.

Question: What if a group of us in the grass fed industry met to develop a standard. Could we have AMS verify it?

Answer: Yes, as noted above AMS could provide third-party verification for a developed industry standard, or AMS could verify individual company standards with regard to grass fed claims upon request. It is important to note, AMS will continue to provide audits by request to verify grass fed claims as well as other claims, but the standard will not be adopted as an AMS-developed standard. As with all voluntary claims, the farmer or business could still elect to use a self-supported claim, use an AMS verified claim, or use a third party approved claim.

Question: What if I wanted FSIS to define particular requirements for what makes up 100% grass fed in more detail when they review voluntary claims?

Answer: That process would involve submitting a petition to FSIS for consideration for rule making.

Additional Information:

USDA further explained this process in their recent blog post: <http://blogs.usda.gov/tag/grass-fed/>

Notes from the USDA AMS conference

call:<http://www.ams.usda.gov/sites/default/files/media/Grass%20Fed%20Conference%20Call%20Notes%2001%2014%2016.pdf>

Animal Welfare Approved Blog Post: Third-Party Certification More Important Than Ever:<http://animalwelfareapproved.org/2016/01/21/third-party-grassfed-certification-more-important-than-ever/>

A copy of the AMS’ standard remains on the USDA website for others to use as their own standard:<http://www.ams.usda.gov/services/auditing/grass-fed-SVS>

The USDA Notice of Withdrawal : <http://www.ams.usda.gov/content/notice-withdrawal-livestock-and-meat-marketing-claims>

Press Release by the National Sustainable Agriculture Coalition: <http://sustainableagriculture.net/blog/release-usda-revokes-grass-fed-label-standard/>

For more information on labeling and point of purchase claims, see USDA, FSIS, LPDD Policy Memo 114A, North Carolina General Statute 106-549.15(12), and NCDA&CS MPID Notice 10-09.

Blacklin, Sarah. (2014). *Special Labeling Claims and the Approval Process for Niche Meat Production*. LF-003. Raleigh, NC: The Center for Environmental Farming Systems. <http://content.ces.ncsu.edu/special-claims-and-the-approval-process-for-niche-meat-production>

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