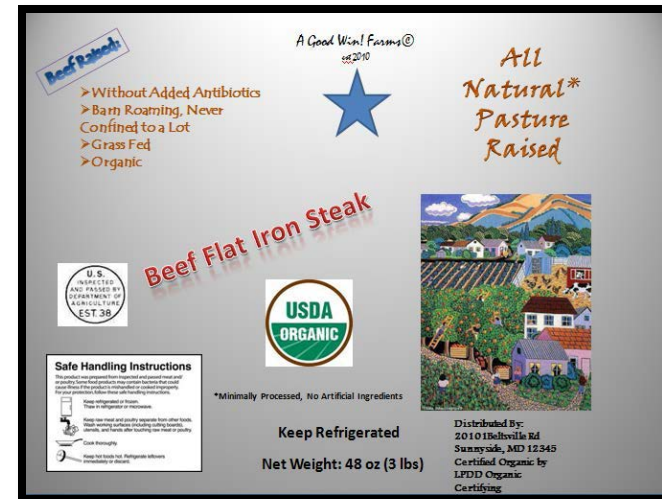
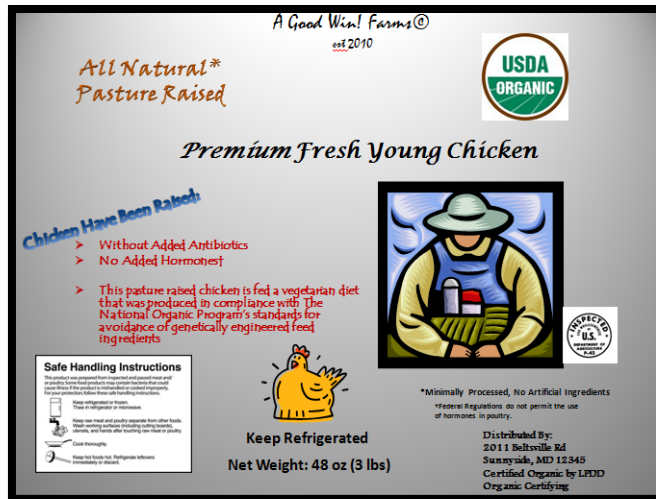


Food Safety and Inspection Service:

Labeling Guideline on Documentation Needed to Substantiate Animal Raising Claims for Label Submission



Presentation given today by:

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USDA, FSIS, Office of Policy Program Development (OPPD)

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Food Safety and Inspection Service:

Labeling Guideline on Documentation Needed to Substantiate Animal Raising Claims for Label Submission

- For over 25 years FSIS has evaluated animal raising claims by considering information on animal raising practices submitted by companies as part of their label approval requests.
- The Agency approved these claims if the animal raising information submitted with the label application supported the claim being made and the claim was truthful and not misleading.
- Because FSIS Jurisdiction starts at the plant, and not the field, we use supporting documentation to verify the claims. Documentation review includes assessing protocols, affidavits, and other documentation, as needed.

Food Safety and Inspection Service:

Purpose of this Compliance Guideline

- On September 30, 2016 FSIS published a compliance guideline “Labeling Guideline on Documentation Needed to Substantiate Animal Raising Claims for Label Submission”
(<http://www.fsis.usda.gov/wps/portal/fsis/topics/regulatory-compliance/labeling/Claims-Guidance>)
- FSIS, OPPD Labeling and Program Delivery Staff (LPDS) is the staff responsible for ensuring that the labeling of meat, poultry and egg products is truthful and not misleading.
- Labels bearing claims referring to the way that the source animal for a meat or poultry product was raised need to be evaluated and approved.
- FSIS developed this guideline to respond to numerous requests to LPDS through phone calls, askFSIS questions, industry, consumer groups and other correspondence regarding the type of information needed to support the approval of labels bearing animal raising claims.

Food Safety and Inspection Service:

Who is this guideline designed for

- This guideline is intended to assist in the approval process for labels bearing animal raising claims.
- This guideline is for establishments that are designing or modifying meat or poultry product labels with animal raising claims. The establishment must determine what supporting documentation is required for the various types of animal raising claims. This guideline will assist the establishment in making this determination.

Food Safety and Inspection Service:

How will FSIS verify whether establishments meet requirements related to this guideline

- FSIS in-plant personnel conduct label verification activities as described in FSIS Directive 7221.1. This Directive provides instructions to in-plant personnel (IPP) for conducting the General Labeling task in the Public Health Information System (PHIS).
- For product bearing animal raising claims, in-plant personnel Consumer Safety Inspectors (CSI) verify whether establishments maintain FSIS label approvals on file. Animal raising claims are special statements and claims that establishments are required to submit to FSIS for approval for compliance with 9CFR 412.1 (Label Approval Guideline).
<http://www.fsis.usda.gov/wps/wcm/connect/bf170761-33e3-4a2d-8f86-940c2698e2c5/Comp-Guide-Labeling-Evaluation-Approval.pdf?MOD=AJPERES>
- Some companies have chosen The USDA, Agricultural Marketing Service (AMS), Process Verified Program (PVP) as a 3rd party verification program for verifying their animal raising claims on labels. AMS, PVP provides an independently verification program by AMS auditors.

Food Safety and Inspection Service:

Product Labeling: Use of the Animal Raising Claims on the Labels of Meat and Poultry Products

- Federal establishments are required to use labels that are in compliance with the Federal Meat Inspection Act (FMIA) and the Poultry Products Inspection Act (PPIA) and the implementing regulations.
- Requirements include all mandatory labeling features stated in 9CFR 317.2 (inspection legend, product name, handling statement, ingredient statement, net weight, address (signature) line, additions for raw meat or poultry safe handling instructions, nutrition facts panel).
- Although FSIS does not exercise authority of prior label approval to point of purchase materials (e.g., pamphlets and placards displayed with the products) sold at retail bearing animal raising claims, however FSIS does require these materials to be in accordance with the federal regulation. This means the materials should only bear the claims that received prior approval from LPDS.

Food Safety and Inspection Service:

Product Labeling: Use of the Animal Raising Claims on the Labels of Meat and Poultry Products

- Labels bearing animal raising claims are required to be approved by FSIS prior to use in commerce for compliance with 9CFR 412.1.
- Labels bearing animal raising claims must be submitted to LPDS with specific documentation to support all animal raising claims that appear on that label.
- The following 2 slides are examples of animal raising claims but not limited to those stated.

Food Safety and Inspection Service:

Examples of claims covered in the guideline

Beef Rated

- Without Added Antibiotics
- Barn Roaming, Never Confined to a Lot
- Grass Fed
- Organic

A Good Win! Farms®
est. 2010

**All Natural*
Pasture
Raised**

Beef Flat Iron Steak

U.S. INSPECTED AND PASSED BY DEPARTMENT OF AGRICULTURE EST. 38

USDA ORGANIC

Safe Handling Instructions
This product was prepared from inspected and passed meat and/or poultry. Some food products may contain bacteria that could cause illness. If the product is mishandled or cooked improperly, for your protection, follow these safe handling instructions.

- Keep refrigerated or frozen. Thaw in refrigerator or microwave.
- Keep raw meat and poultry separate from other foods. Wash working surfaces (including cutting boards), utensils, and hands after touching raw meat or poultry.
- Cook thoroughly.
- Keep hot foods hot. Refrigerate leftovers immediately or discard.

*Minimally Processed, No Artificial Ingredients

Keep Refrigerated

Net Weight: 48 oz (3 lbs)

Distributed By:
20101 Beltsville Rd
Sunnyside, MD 12345
Certified Organic by
LPDD Organic
Certifying

Food Safety and Inspection Service:

Examples of claims covered in the guideline

A Good Win! Farms®
est. 2010

All Natural*
Pasture Raised



Premium Fresh Young Chicken

Chicken Have Been Raised:

- Without Added Antibiotics
- No Added Hormones
- This pasture raised chicken is fed a vegetarian diet that was produced in compliance with The National Organic Program's standards for avoidance of genetically engineered feed ingredients



Safe Handling Instructions
This product was prepared from inspected and passed meat and/or poultry. Some food products may contain bacteria that could cause illness if the product is mishandled or cooked improperly. For your protection, follow these safe handling instructions.

- Keep refrigerated or frozen. Thaw in refrigerator or microwave.
- Keep raw meat and poultry separate from other foods. Wash working surfaces (including cutting boards), utensils, and hands after touching raw meat or poultry.
- Cook thoroughly.
- Keep hot foods hot. Refrigerate leftovers immediately or discard.



Keep Refrigerated
Net Weight: 48 oz (3 lbs)

*Minimally Processed, No Artificial Ingredients
*Federal Regulations do not permit the use of hormones in poultry.

Distributed By:
2011 Beltsville Rd
Sunnyside, MD 12345
Certified Organic by LPDD
Organic Certifying

Food Safety and Inspection Service:

Examples of claims covered in the guideline

Examples of claims include, but are not limited to:

Grass Fed

Animal Welfare and Environmental Stewardship

Raised without Hormones

No Added Hormones –Note: Hormones are only approved for use in beef cattle and sheep production. Therefore, the claim on other species of meat cannot be approved unless it is further qualified, e.g., linked to the statement on the same panel as the claim “Federal regulations prohibit the use of hormones in poultry (or pork, veal, or exotic, non-amenable meat products)”

Food Safety and Inspection Service:

Examples of Claims (continued)

Breeds Beef (Angus, Piedmontese, Wagyu),
Poultry (Silkie, Plymouth Rock) Pork (Berkshire,
Duroc)

Raised Without Antibiotics

AMS Process Verified Program – 3rd
Party Certification

Living/Raising/Raising Conditions (These claims
refer to environment in which the animals were
raised during their lifespan)

Food Safety and Inspection Service:

Animal Raising Claim Supporting Documentation

For most animal production claims, the documentation needed to support these claims are:

1. A detailed written description explaining the controls used for ensuring that the raising claim is valid from birth to harvest or the period of raising being referenced by the claim.

2. A signed and dated document describing how the animal are raised (e.g., vegetarian fed, raised without antibiotics, grass fed), to support that the specific claim made is truthful and not misleading;

3. A written description of the product tracing and segregation mechanism from time of slaughter or further processing through packaging and wholesale or retail distribution;

Food Safety and Inspection Service:

Animal Raising Claim Supporting Documentation

For most animal production claims, the documentation needed to support these claims are:

4. A written description for the identification, control, and segregation of non-conforming animals/product; and

5. If a third-party certifies a claim, a current copy of the certificate.

Food Safety and Inspection Service:

Exceptions to Providing Documentation Previously Referenced When Duplicating Animal Raising Claims from Purchased Product

Establishments may use purchased product in a secondary product or repacking product bearing claims and may want to carry those claims over to a new label. Examples of claims that can be carried over include Breed Claims, Diet Claims, and Raising Claims.

However, companies cannot carry over claims from purchased products that are certified by a third party entity. For example, Organic, Process Verified Program, or Certified Humane cannot be carried forward without the company producing the final product having its own certification or verification.

Companies will need to provide the following:

1. A detailed written description explaining the controls used for ensuring that the raising claim is valid from birth to harvest or the period of raising being referenced by the claim;

2. A signed and dated document describing how the animals are raised (e.g., vegetarian fed, raised without antibiotics, grass fed), to support that the specific claim made is truthful and not misleading

Food Safety and Inspection Service:

Questions? Contact LPDS

Submit a Question
to askFSIS

- <http://askfsis.custhelp.com>
- Questions are sent to a main portal, triaged, and assigned to the correct expert based on subject matter.

Call:

- Main: 301.504.0878
- Distribution Unit: 301.504.0883

Labeling
Procedures

- [Labeling Procedures/index.asp](http://www.fsis.usda.gov/Regulations_and_Policies)
- [http://www.fsis.usda.gov/Regulations & Policies](http://www.fsis.usda.gov/Regulations_and_Policies)

Food Safety and Inspection Service: **Websites**

Food Safety Inspection Service

<http://www.fsis.usda.gov/>

Labeling and Program Delivery Staff

http://www.fsis.usda.gov/About_Fsis/labeling_&_consumer_protection/index.asp

Code of Federal Regulations

<http://www.access.gpo.gov/nara/cfr/cfr-table-search.html>

FSIS Food Standards and Labeling Policy Book

http://www.fsis.usda.gov/OPPDE/larc/Policies/Labeling_Policy_Book_082005.pdf

A Guide to Federal Food Labeling Requirements for Meat and Poultry Products

http://www.fsis.usda.gov/pdf/labeling_requirements_guide.pdf

Labeling Guideline on Documentation Needed to Substantiate Animal Raising Claims for Label Submissions

<http://www.fsis.usda.gov/wps/portal/fsis/topics/regulatory-compliance/labeling/Claims-Guidance>