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Meat Marketing: Use of Animal Raising Claims and “Natural”

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Executive Summary

Promoting and labeling meat with production or animal raising claims such as “no hormones added” or “raised without antibiotics” or with the term “natural” is often thought to help differentiate products in the marketplace. Regulations are in place to standardize the definition and usage of these terms. Producers must obtain approval to use these claims on labels or marketing materials from the USDA Food Safety and Inspection Service.

Introduction

Promoting and labeling meat with production or “animal raising” claims or the term “natural” is often thought to help differentiate products in the marketplace. Products making these claims often demand a premium price above that of products produced under conventional means. In the past, some confusion has existed as to the definition of terms used on labels and in marketing materials. Efforts are being made by the United States Department of Agriculture (USDA) to standardize the use of terms among producers to provide for some consistency in the marketplace. These efforts include the necessity of gaining approval by the Food Safety and Information Service (FSIS) for use of claims on labels or marketing materials. This fact sheet is intended to introduce producers interested in making label claims to definitions and USDA protocol and should not be used as a sole source of information. Producers considering labeling claims should contact the USDA directly.

Animal Raising Claims

Production methods often thought by consumers to be included in the term “natural” and additional indications of quality or product characteristics can be described as production or animal raising claims. Such claims must also be approved for use on labels and in marketing materials through the USDA, FSIS. In order to facilitate this process and create some standardization on the usage of claims, the USDA Agricultural Marketing Service (AMS) has developed proposed minimum requirements for marketing claims related to livestock and meat production (Federal Register, 2002). Minimum requirements are given for specific claims about antibiotics, breeds, free range, geographic location, grain fed, grass fed, hormones, livestock identification, preconditioning, Vitamin E, aged meat, electrical stimulation and tenderness. Claims and minimum requirements from the Federal Register are given in Table 1.

Table 1: Summary of Meat Production and Animal Raising Claim Definitions	
Claim	Minimum Requirement
No antibiotics used, or Raised without antibiotics	Livestock have <i>never</i> received antibiotics from birth to harvest.
No subtherapeutic antibiotics added, or Not fed antibiotics	Livestock are not fed subtherapeutic levels of antibiotics. They may receive treatment for illness provided the approved FDA withdrawal period is observed.
No detectable antibiotic residue (analyzed by “method x”)	LCPS requires additional information on the label that clearly informs the consumer/ purchaser that the animal may have been treated with antibiotics. Livestock may receive antibiotics during the production phase, provided: (1) All antibiotics are withdrawn at least 30 days beyond the minimum FDA withdrawal requirement (<i>e.g.</i> , if the FDA minimum withdrawal period is 10 days, the minimum withdrawal period for the United States Standard for Livestock and Meat Marketing Claims would be at least 40 days); and, (2) Livestock and meat products contain no detectable antibiotic residue as verified by statistical sampling analysis using a science-based testing protocol. The specific test protocol and sensitivity of that method must be disclosed (“method x”).
Breed Claims	Claims for breed of livestock must meet criteria established by an AMS-recognized U.S. breed association for the referenced breed. If the breed association does not establish criteria for this claim, animals must be traceable to a parent registered with a breed association.
Free Range, Free Roaming, or Pasture Raised.	Livestock that have had continuous and unconfined access to pasture throughout their life cycle, including: Cattle *—Shall never be confined to a feedlot. Sheep *—Shall never be confined to a feedlot. Swine *—Shall have continuous access to pasture for at least 80% of their production cycle. * FSIS requires product labels from red meat species with these claims also include the following further qualifying statement: “Free Range—Never Confined to Feedlot.”
Location of Raising (e.g., “Tennessee Beef”)	The livestock are raised/grown in the specified geographic location from birth to harvest.
Location of Finishing	The livestock are fed/finished in the specified geographic location for at least the last 100 days prior to harvest.
Grain Fed (e.g., Corn Fed, if corn is the primary ingredient)	Livestock are finished on high concentrate rations (grain feeding) to enhance meat palatability. A high concentrate grain ration is any cereal plant product that meets or exceeds 60 Mega calories (Mcal) Net Energy for gain (NEg) per 100 pounds of ration dry matter (1996 NRC for cattle, 1998 NRC for swine). Cattle—(1) Average grain consumption must equal 50% or more of the ration; (2) Neg must average at least 60 Mcal per 100 pounds of ration dry matter; (3) Dry Matter Intake (DMI) during the finishing phase must be at least equal to: ((Cattle shrunk weight at the beginning of the finishing phase \square 0.014) + 10 pounds). DMI tolerance cannot be less than 10% of this formula; and, (4) Minimum number of days on feed is 100 days for slaughter steers and heifers and 30 days for cows. Lambs—(1) Average grain consumption must equal 50% or more of the ration; and, (2) Minimum number of days on feed for slaughter lambs is 50 days. Swine—(1) Average grain consumption must equal: (a) 45% or more of the nursery phase (pig weight: 15–65 pounds) ration; and, (b) 65% or more of the finishing phase (pig weight: 65–300 pounds) ration. (2) Minimum number of days on feed for slaughter hogs is 60 days.

Table 1 (Continued): Summary of Meat Production and Animal Raising Claim Definitions	
Claim	Minimum Requirement
Grass Fed	Grass, green or range pasture, or forage shall be 80% or more of the primary energy source throughout the animal's life cycle.
No supplemental hormones used, Raised without supplemental hormones, or No added hormones	The livestock have <i>never</i> received supplemental hormones from birth to harvest.
No hormones* administered during finishing	The livestock have not received supplemental hormones during the feeding/finishing period. * The terms "hormone," "growth promotant," "growth stimulant," and "implant" are used interchangeably.
Source Verified	Must include the following: (1) Method of livestock identification; (2) Location(s) where livestock are born, raised, fed, harvested, and processed; and, (3) Identification of the producer(s).
Individual Animal Identification	Must fulfill the Source Verified requirements and also have unique, individual animal identification. The American Information Number (AIN) system or other numbering scheme that provides for unique identification of animals and verification of program claims may be used.
Preconditioned for "x" days (where "x" is the number of days prior to sale/shipping)	Animals for which a preconditioning claim is made must receive the following treatments (as appropriate) at least 45 days prior to their sale/shipment: (1) Dehorning (when applicable); (2) Castration (if male); (3) Vaccinations; (4) Treatment for control of parasites; (5) Weaning; and, (6) Training to eat and drink from feed and water bunks.
Cattle have been fed supplemental levels of Vitamin E. (Promotion of Vitamin E use is limited to livestock producers, packers, and wholesalers.)	(1) Minimum of 50,000 International Units (IU)/head during feeding period (IU tolerance = \pm 15%); (2) Minimum feeding period of 30 days; and, (3) Minimum carcass alpha-tocopheryl acetate concentration from the neck muscle (rectus capiti dorsalis major) not less than 3.2 micrograms (\pm g) alphantocopheryl acetate/gram (g) of tissue. (Alpha-tocopheryl acetate concentration tolerance = \pm 15%).
Aged Meat Products	Type of aging and length of postmortem aging (in days) must be specified. The actual number of days aged and type of aging (dry or wet) may also appear on the retail label. Beef.—Must be wet aged for a minimum of 21 days or dry aged for a minimum of 35 days.
Electrically Stimulated Beef	The electrical stimulation applied to the carcass must meet the following minimum requirements: (1) The cross product of voltage and amperage (voltage multiplied by amperage) must be \geq 500; and, (2) Consist of at least three cycles with a minimum pulse of \geq 1.5 seconds "on" and \geq 1.0 second "off."
"Company X's" Tender "Species"	A tenderness management system must include at least 3 of the following controlled elements and must be statistically verified ($P \leq 0.05$) to meet an objective tenderness evaluation of a WBS score ≤ 4.0 kg, using a 1/2 inch (1.27 cm) core, when cooked to 160°F (71°C). * The objective tenderness evaluation must be revalidated on an annual basis. Controlled Elements: (1) Genetics; (2) Age of livestock; (3) Feeding management; (4) Electrical stimulation; (5) Aging; (6) Ingredients added to enhance tenderness; (7) Instrument assessment (e.g., validated carcass sorting system, pH values, etc.); or, (8) Mechanical (e.g., blade tenderization, etc.). * Protocol shall be as established in the 1995 edition of the American Meat Science Association's Research Guidelines for Cookery, Sensory Evaluation, and Instrumental Tenderness Measurements of Fresh Meat. (Available from the National Cattlemen's Beef Association, Centennial, CO.)

“Natural” Claims

“Natural” is one term that differentiates products from conventional products. The use of the term “natural” is often misunderstood by consumers to indicate no added hormones or antibiotics used in production (Diel and Associates, 2001). According to USDA, the term simply indicates no artificial flavor, color or chemical preservative and that the product is minimally processed.

FSIS Policy regarding labeling of products as “natural” is given in the Food Labeling Division Policy Memo 055 dated November 22, 1982. Applicable portions of the memo are presented below:

The term "natural" may be used on labeling for meat products and poultry products, provided the applicant for such labeling demonstrates that: 1) The product does not contain any artificial flavor or flavoring, coloring ingredient, or chemical preservative (as defined in 21 CFR 101.22), or any other artificial or synthetic ingredient; and 2) the product and its ingredients are not more than minimally processed. For the purposes of this memorandum, minimal processing may include: (a) those traditional processes used to make food edible or preserve it or make it safe for human consumption, e.g., smoking, roasting, freezing, drying, and fermenting; or (b) those physical processes which do not fundamentally alter the raw product and/or which only separate a whole, intact food into component parts, e.g., grinding meat, separating eggs into albumen and yolk, and pressing fruits to produce juices...

All products claiming to be natural or a natural food should be accompanied by a brief statement which explains what is meant by the term natural, i.e., that the product is a natural food because it contains no artificial ingredients and is only minimally processed. This statement should appear directly beneath or beside all natural claims or, if elsewhere on the principal display panel, an asterisk should be used to tie the explanation to the claim. The decision to approve or deny the use of a natural claim may be affected by the specific context in which the claim is made. For example, claims indicating that a product is a natural food, e.g., "Natural chili" or "chili - a natural product" would be unacceptable for a product containing beet powder which artificially colors the finished product. However, "all natural ingredients" might be an acceptable claim for such a product.

Obtaining Approval

In order to obtain approval to use claims on labels and in marketing materials, an *Application for Approval of Labels, Marketing or Device*, FSIS Form 7234-1, will need to be submitted to the FSIS along with supporting information to verify the claims are true. Supporting information may include an operational protocol describing in detail the production practices employed, affidavits and testimonials, feed formulas and/or certificates, depending on the claim. The application also asks for a complete sketch of any proposed label including these claims.

Questions or assistance regarding the use of animal raising claims or “natural” and the approval process can be directed to Ms. Tammie Myrick, Food Technologist, Labeling Review Branch, Labeling and Additives Policy Division of the USDA FSIS at Area Code (202) 205-0623. In a telephone call with Ms. Myrick, she stated that the review process typically takes only a few days once the application is submitted.

References

- Diel and Associates. *Study of Consumer Perceptions of All Natural Meat Products*. April 2001.
- Federal Register. *United States Standards for Livestock and Meat Marketing Claims*. Volume 67, Number 250. December 30, 2002.
- FSIS, USDA. *Animal Production Claims: Outline of Current Process*. Available online June 3, 2004 <<http://www.fsis.usda.gov/OPPDE/larc/Claims/RaisingClaims.pdf>>.
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