Four Important Points

• Regulatory agencies are not your enemy.
• State and federal agencies can provide valuable resources for bison producers.
• Each agency has a specific mission area and scope of authority.
• Understanding those roles sometimes resembles “Who’s on First.”
Navigating the Maze

USDA

AMS

FSIS

HHS

FDA
Bison Meat Inspection

• Non amenable
  – Under FDA jurisdiction
    • must be processed in FDA approved plant
    • Still subject to all FDA label requirements
    • Guidance found in FDA Food Code 2009 3-201.17
      [http://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/ucm186451.htm](http://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/ucm186451.htm)
  – States can impose stricter regulations

• Meat - Custom Processing (Colorado)
  • Meat processed by custom processors may not be sold to anyone, but may be consumed only by the animal's owners.
Bison Meat Inspection

- “Voluntary” inspection
  - Processors pay for USDA Inspection
  - State inspected meat can be sold interstate.”
  - Regulations contained in 9 CFR §352
    - Includes provisions for field-slaughter
Meat Labeling

• Retail
  – FSIS and FDA cooperate on labeling rules
    • Regs contained in 7 CFR §101
  – Agencies developed 2007 Guide To Federal Food Labeling Requirements For Meat, Poultry, And Egg Products

• Foodservice
  Primarily governed by state health departments
Labeling Requirements

• Food product labels must include nutritional information, safe handling instructions, accurate descriptions of ingredients.

• Regulations govern the type sizes used for the items on label.

• Labels must be formally submitted to the FSIS Labeling and Program Delivery Service.
Federal Label Requirements

- Product name,
- Inspection legend and establishment number,
- Handling statement,
- Net weight statement,
- Ingredients statement,
- Address line,
- Nutrition facts, and
- Safe handling instructions*

*Not required for non-amenable
VOLUNTARY LABEL CLAIMS
No Growth Hormone/No Antibiotic

• No growth hormone
  – Must include asterisk and statement “Federal regulations prohibit the use of growth hormones in bison”

• No antibiotic
  – FSIS has allowed use of affidavits
  – AMS has an audit-based system
  – This is shifting from FSIS to AMS
Organic

• Most tightly regulated claim
• “Organic” prohibited on label unless products certified under 7 CFR §205
  
  – [http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=3f34f4c22f9aa8e6d9864cc2683cea02&tpl=/ecfrbrowse/Title07/7cfr205_main_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=3f34f4c22f9aa8e6d9864cc2683cea02&tpl=/ecfrbrowse/Title07/7cfr205_main_02.tpl)

  – Land
    • No prohibited materials for 3 years
    • Buffer zones

  – Animals
    • 100% organic pasture & feed
    • Must be raised organic from last third of gestation
    • No paraciticides
Organic (cont.)

• 100% organic
  – Just what it says
  – Can use USDA Label

• Organic
  – 95% organic ingredients
  – Other 5% either organic, or from National List
  – Can use USDA label

• Made with Organic
  – At least 70% organic ingredients
  – Other 30% must not include excluded methods
  – Cannot use USDA seal
Non GMO

- Must be a feed claim, not an animal claim
- Largest certification label is Non GMO Project Verified
  - Any meat label must include language stating: *Animals exclusively fed a diet verified to be in compliance with the Non GMO Project standards for the avoidance of genetically engineered materials.*
  - GMO detection level is 00.9%
- Whole Foods, Target moving to require labeling of products containing or made with GMO’s
- Legislation introduced on labeling
Grassfed

• Prior to January 2016, the USDA Agricultural Marketing Service maintained specific requirements for a “USDA Verified Grassfed” label
  – That language was withdrawn in January 2016
  – Producers can still apply for a USDA Process Verified Program, but can develop their own protocols.

• AGA Grassfed Certification
  – Similar feed requirements
  – No confinement
  – Variety of certifiers allowed
Grassfed (Cont…)

• Animal Welfare Approved
  – Ruminants raised on pasture for their entire lives, with an entirely grass and forage diet
  – Stringent animal welfare and environmental requirements
  – Strict protocols for handling, transport, and slaughter of animals, including an annual review of slaughter facilities
  – Note: AWA used to be the auditor for AGA standards.
    – http://animalwelfareapproved.org/standards%20/awa-grassfed/
Humanely Raised

- Private Certification Organizations
  - Humane Farm Animal Care
  - American Humane Certified
  - Animal Welfare Approved
    - [http://animalwelfareapproved.org/](http://animalwelfareapproved.org/)
  - Global Animal Partnership

- All are audit based programs

NBA developing Best Management Practices
Dietary Claims

• FSIS Guide To Federal Food Labeling Requirements For Meat, Poultry, And Egg Products contains rules for
  – Low fat, reduced fat
  – Low cholesterol
  – High Protein
  – Etc.

• Regulatory language: 7 CFR §101
Heart Healthy

• Registered trademark of American Heart Association

• Product must be tested for nutritional levels
  – Total fat 3 gr. Or less
  – Saturated fat 1 gr. Or less
  – Cholesterol 20 mg. or less
  – Sodium 480 mg or less
  – Etc.