



National Bison Association

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Meat Inspection, Processing and Labeling Issues for Bison

National Bison Association Priority Issues Briefing Paper
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The Bison Processing Picture Today

Producers on private and tribal lands are working to increase the herds as bison meat grows in popularity on restaurant menus and in retail meat cases across the country. Increasing demand for bison is one of the reasons that the National Bison Association, the InterTribal Buffalo Council, and the Wildlife Conservation Society in July launched *Bison 1 Million*, a campaign to restore one million bison to North America over the next 10-15 years.



Last year, 60,300 bison were processed under federal or state inspection. That production roughly equals the number of beef animals processed during an average workday in the United States. Slightly more than 85 percent of those bison were processed in federally inspected facilities, with the remaining 15 percent handled in state inspected facilities.

Meat processing issues continue to be a bottleneck in the producers' ability to connect with their customers. This is particularly true for producers located outside of the Rocky Mountain region or the Dakotas, where the bulk of bison processing occurs. Across the country, small and very small meat processing plants provide the backbone of the commercial bison infrastructure.

Bison producers utilizing those meat plants share many concerns and challenges with producers of cattle, pork and other amenable species. But, we also have unique barriers resulting from our designation as a nonamenable species.

Five key issues severely impede bison producers, and the small plants that provide the slaughter and fabrications services.

Cost of Federal Inspection

Bison already commands a premium price in the marketplace because of the slower-growing nature of the animal, and the yield structure of a bison carcass compared to beef. The high cost of voluntary inspection is simply pricing bison meat out of the marketplace for many producers.

For the handful of plants processing larger volumes of live bison, the base rate of \$55.84/hr. for FSIS inspection services can be spread over many carcasses. But most producers don't have access to those plants. Their animals are processed in plants that generally handle fewer than 15 head/day.

And, the cost of inspection multiplies as the carcass moves through fabrication and further processing. One member of the National Bison Association's Small Meat Plant Working group reports:

“My inspection cost is now working out to about \$140 per animal.” That translates into an additional \$0.33/lb. in the wholesale price of bison meat.

Our Recommendations

1. Amend 9CFR §352 to allow for a flat fee per animal, as opposed to an hourly rate, for small and very small meat plants; and/or
2. Clearly define the time allotment for voluntary inspection to eliminate donning and doffing, etc.
3. Establish a grant program for small and very small plants to be able to defray the voluntary inspection costs.
4. Establish a grant program within the 2018 Farm Bill to allow small and very small meat plants to offset at least a portion of the cost of voluntary inspection.

Inconsistent Interpretation of Regulations

It is understandable that federal meat inspectors don't have regulations regarding bison (including 9CFR §352 regarding field slaughter) committed to memory. However, bison producers utilizing small and very small meat plants report significant discrepancies in the understanding and adherence of provisions regarding the slaughter of nonamenable species under voluntary inspection.

Patrick Toomey of the InterTribal Buffalo Council reports, “We cross many jurisdictions, so the inconsistency in interpretation and enforcement of the voluntary inspection regulations is a significant problem.”

During the past three months, the National Bison Association has provided information to members in South Carolina and Alabama for the purpose of educating their local inspectors about federal regulations regarding bison slaughter.

The inconsistent interpretation of regulations are creating additional barriers for producers who are seeking to utilize mobile slaughter facilities. These facilities are becoming increasingly popular as small-scale ranchers seek processing methods that are humane and adhere to the “one bad day” philosophy of animal husbandry. Mobile slaughter facilities are often particularly suited for bison producers who lack ready access to brick and mortar slaughter facilities.

FSIS field personnel, however, are often not aware of the provisions in 9CFR §352 regarding field slaughter of nonamenable species.

Our Recommendation

USDA FSIS should develop a guidance document to be distributed to all inspectors regarding the regulations regarding inspection of nonamenable species, including the field slaughter provisions of 9CFR §352.

Humane Slaughter Provisions

Because most bison are processed in facilities that handle fewer than 100 animals/day, and are normally slaughtered without captive bolt stunners, strict enforcement of the one-shot rule is a major factor in many small and very small processing plants refusing to handle bison.

National Bison Association members report that plants they utilize have been shut down for 3-5 days following an incident in which a bison was not rendered insensible on the first shot. Those plants too

often decide that the risk of suspension or closure resulting from a non-compliance while processing bison is not worth the income from processing those animals.

The National Bison Association commends FSIS for establishing the office of Ombudsman for Humane Handling. This office can serve as the conduit for identifying potential guidance and policies that acknowledge the realities within small and very small meat processing plants.

Our Recommendation

We encourage the office to work directly with small and very small plants to develop new procedures that will acknowledge good faith efforts to comply with the Humane Slaughter Act requirements.

Truth in Labeling

Although our species is technically classified as bison, a significant portion of the consuming public identifies our animals as buffalo. Some food companies and pet food manufacturers are now marketing products as buffalo, or including buffalo as an ingredient, without explaining that the products or ingredients are water buffalo. In one instance, product marketed as bison was actually water buffalo. This constitutes deceptive labeling and should be addressed.

Our Recommendation

The National Bison Association filed formal comments with the FSIS and the Food and Drug Administration in 2015 urging that the new edition of the *Food Standards and Labeling Policy Book* clarify the confusing and misleading use of the term buffalo when used to describe bison vs. water buffalo. Specifically, we request that the book require that any products containing water buffalo be required to be labeled with the full name, rather than as "buffalo."

Interstate Shipment

Since the Cooperative Interstate Shipment Program regulations were finalized in 2012, only four states have stepped forward to participate in this program. The provisions established in the 2008 Farm Bill provide an opportunity for state-inspected plants to increase their economic viability by processing amenable species meat for interstate shipment. However, the regulations implementing this program have been viewed as unduly burdensome in many states.

Our Recommendation

FSIS should conduct a thorough review of the current Cooperative Interstate Shipment Program Regulations with the intent to identify amendments that would increase participation.