



National Bison Association

8690 Wolff Court, Suite 200 Westminster, CO 80031-3646
www.BisonCentral.com Phone: 303-292-2833 Fax: 303-845-9081



Bison Issues Overview, September 2022

Bison Issues for USDA FSIS

The National Bison Association commends FSIS on how it approached the congressionally mandated listening sessions this past June on the topic of bison becoming an amenable species. FSIS made every effort to hear from all bison stakeholders on this important topic at the two listening sessions with top leadership and staff attending both sessions in South Dakota and Colorado, including Administrator Kiecker.

The NBA also commends FSIS for implementing the important change to extend overtime and holiday inspection fee relief to small and very small establishments, as the largest bison processor is still considered a “small establishment” as they have less than 500 employees.

The COVID-induced disruption in the meat processing sector that is still in recovery impacted producers of nearly every livestock species. Bison producers are no exception and continue to face significant delays in getting their animals processed in USDA inspected facilities.

These are the issues our delegation would like to discuss in our meeting on September 20th.

Bison as a Non-Amenable Species

When the National Bison Association learned this past spring that FSIS was considering changing bison’s status from an amenable to a non-amenable species, the first step we took was to convene the NBA’s Commercial Marketers Committee, which includes the industry’s largest bison producers and marketers, to discuss the matter. The meeting resulted in no support being voiced for bison designated as an amenable species at this time. Further, the NBA heard from many members who also oppose bison designated as an amenable species. In short, the vast majority of bison industry stakeholders see no need to change the bison’s current designation as a non-amenable species because our industry is healthy and growing under current regulations and industry protocols.

The primary opposition cited among participants is the many unknown implications of switching the bison’s status. A change to amenable could very well lead to costly infrastructure and management changes for current processors who are already struggling to keep up with demand as the processing bottleneck continues to impact bison producers across the country. Further, many bison producers utilize state-inspected programs in participating states, as non-amenable species like bison can be shipped interstate, unlike amenable species in most cases. As such, NBA members and processors do not want to lose the ability to utilize state-inspected facilities, a service that is paid for by the state, unlike FSIS voluntary inspection. Additionally, the ability to field slaughter is crucially important for NBA members, especially tribal members and small producers across the country who increasingly utilize field slaughter for the sake of cultural preservation, meat quality, animal welfare, and consumer demand.

Training Resources for Small and Very Small Processing Plants

The National Bison Association strongly supports the Strengthening Local Meat Processing Act and encourages FSIS to adopt any recommendations from that bill that can be implemented without additional legislation. The NBA strongly recommends that FSIS expand resources for developing and implementing resources to help address the critical labor shortage being experienced within the meat processing sector. Development of small processor training, education and technical assistance grants would be one important step in addressing this shortage. Many community colleges and other higher education institutions are looking at developing certificate programs for meat processing employees. FSIS could support these efforts through the development of curriculum to be used in those training programs.

Revised Classification for Meat Plants with Fewer than 500 Employees

The definition of small meat plants is simply too broad. A facility employing 50 workers faces significantly different challenges than a facility with 450 workers. We recommend three subcategories for facilities currently classified as small:

- 10 – 100 employees
- 101 – 249 employees
- 250 – 499 employees

Preventing Deceptively Labeled Water Buffalo Products

The National Bison Association has been working for the past five years to address deceptively labeled water buffalo products in the U.S. marketplace. We would appreciate an update on a request that we made last year as follows:

The definitions in 9 CFR §352.1(f), does not adequately address this issue. The definition adopted in the final rule published on July 15, 2021, states:

(f) *Buffalo* refers to a subtribe Bubalina of the tribe Bovini within the subfamily Bovinae that includes the water buffalo (*Bubalus bubalis*) and Cape buffalo (*Syncerus caffer*).

This definition does nothing to stop deceptively labeled products in the marketplace. We urge FSIS to instead adopt language similar to the model definitions developed by the Association of American Feed Control Officials in January 2020:

Bison. Common name for *Bison bison*. The meat or other ingredients derived from the animal (e.g., by-products, meal, fat) must be referred to as “bison,” “North American buffalo,” “bison _____,” or “North American buffalo _____” with the specific non-meat ingredients filling in the blank.

Water Buffalo. Common name for *Bubalus bubalis*. The meat or other ingredients derived from the animal (e.g., by-products, meal, fat) must be referred to as “water buffalo,” or “water buffalo _____” with the specific non-meat ingredients filling in the blank.