



SUSTAINABLE AGRICULTURE COALITION

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ACTION ALERT

Please Take Immediate Action

Submit your comments supporting the proposed 99% grass or forage fed requirement for the GRASS FED MEAT LABEL CLAIM

August 10th Deadline

Your letter or e-mail will help prevent the good 99% grass or forage feeding requirement from being finalized with a less stringent standard. A weakened regulation will disrupt the important and growing niche market created by small and medium-sized sustainable livestock producers, limit the positive environmental and animal health effects of the grass fed industry, and erase the consumer health benefits of grass fed animal products.

Key Point: The proposed 99% grass or forage feeding requirement for livestock products labeled “grass fed” by the USDA’s Process Verified Program should be *approved*.

Second Point: As soon as it has finalized the new grass fed label claim rule, USDA should issue for public comment new proposed label claim standards for free range or pasture-raised livestock and for livestock raised with no antibiotics and no supplemental hormones. (For more information on these claims, see [meat label claims background](#).)

Comments should be addressed to:

- **Letters:** Chief, Standardization Branch, Livestock and Seed Program, AMS, USDA, Room 2607-S, 1400 Independence Avenue, SW., Washington, DC 20250-0254
- **Email:** <http://www.regulations.gov/fdmspublic/component/main>

All Comments should refer to Docket No. LS-05-09.

Background: After three years of intensive consultations with a wide array of sustainable agriculture, environmental, and consumer interests, USDA’s Agricultural Marketing Service (AMS) has released a revised proposal for a grass fed meat label claim for its process-verified labeling program. The revised standard, which applies to cattle, sheep and other ruminant livestock, but not pigs, requires that animals certified as “grass fed” receive at least 99 percent of their lifetime energy source from a grass or forage based diet. This is a significant increase from

the original proposal issued in late 2002 stating that at least 80 percent of the lifetime energy source comes from a grass or forage-based diet.

AMS will administer the grass fed label through its Process Verified Program, under which ruminant livestock producers can request that their “grass fed” claim be verified by AMS as meeting the standard’s feeding regime. Under the program, AMS will conduct an on-site evaluation to ensure that the livestock is raised under the standard’s feeding regime. Meat products from livestock raised in accordance with the AMS grass fed standard can then be labeled with the grass fed claim along with the “USDA Process Verified” statement and shield as assurance to consumers that USDA is a third party verifier of the product.

The new proposed standard issued by USDA is in response to an effort led by the Sustainable Agriculture Coalition (SAC) to improve USDA’s 2002 proposal for label standards for grass fed claims, as well as antibiotic use claims; hormone use claims; and free range claims. SAC developed a broad collaboration of interested parties to ask USDA for a more extensive and inclusive process that would allow input from family farm, consumer, humane, and environmental organizations and most importantly, sustainable livestock producers themselves, the group who worked hard to establish the grass fed market.

Over the past decade, numerous scientific studies have shown that the meat and milk from grass and forage fed animals are higher in good fats that may confer health benefits on humans. The grass fed claim, in combination with strong standards for the other meat marketing claims still under consideration by AMS, will also help consumers identify meat products from animals raised in pastured systems that lessen environmental damage and improve animal health.

SAC demanded that the USDA develop a grass-fed label that helped, not hindered producers who were already maintaining a 100% grass fed operation, and not destroy the market by allowing large confined feedlot operations to finish out the animals on a grain-based diet and still make claims to being grass fed. The AMS held a public listening session in 2004 on the issue and heard the same message. SAC is pleased the proposed labeling standard largely reflects the major feeding regime portion of the consensus recommendations. SAC and its collaborators convinced the USDA that the agency had the ability to transform the marketplace and either help or hinder small and moderate sized farms and ranches that have made their livelihoods in such claims.

Please help secure this important victory with your comment letter in support of the proposed label claim standard for grass fed meat! And also urge USDA to issue label claims for public comment on pasture requirements for free range or pasture-raised livestock and for no antibiotics or supplemental hormones.

A sample comment letter follows. Feel free to adapt it and to add whatever other comments you may wish to make about the proposed standard.

Thank you!

<Date>

Chief, Standardization Branch
Livestock and Seed Program, AMS, USDA
Room 2607-S, 1400 Independence Avenue, SW
Washington, DC 20250-0254

RE: Proposed Rule for the United States Standard for Livestock and Meat Marketing Claim,
Grass (Forage) Fed Claim published in the Federal Register on May 12, 2006

[Docket No. LS-05-09].

I am writing to provide comment on the proposed rule for the United States Standard for Livestock and Meat Marketing Claim, Grass Fed Forage Claim. I urge you to approve the proposed rule requiring that animals certified as grass fed receive a minimum of 99% of their lifetime energy source from grass or forage. Scientific research has demonstrated the human health benefits that result from consuming meat and milk products from grass fed animals. The environmental and conservation benefits of grass and forage based livestock systems are also well documented. Finalization of the proposed rule will ensure that grass fed meat products maintain their reputation as a healthy and environmentally sustainable consumer choice, protect the integrity of the USDA label, and benefit the small to moderate-sized sustainable farms that created this thriving market.

In addition to approving the proposed regulation, I strongly encourage your office to quickly move forward on developing revised requirements for livestock labeling claims related to hormones, antibiotics, and pasture requirements. The proposed 99% grass or forage feeding requirement is definitely an excellent first step in the right direction, but this rule will only become truly effective when it can be considered comprehensively with hormone, antibiotic, and free range claims. These additional standards must be addressed in a timely fashion to guarantee the labeling system remains a valuable tool for producers, and continues to send consumers a reliable message.

<Name>

<Address>