



SUSTAINABLE AGRICULTURE COALITION

110 Maryland Avenue N.E. Phone 202.547.5754
Washington, D.C. 20002 Fax 202.547.1837
www.msawg.org

What's in a claim?

USDA to define Antibiotics, Grass-fed, Free-range, and Hormone-free labels

In December 2002, the USDA proposed standards for label claims that would have undermined the integrity of meat-marketing labels, mislead consumers, and had a negative effect on small and mid-sized farmers who are pioneers in these new emerging markets.

After public outcry, USDA withdrew those proposed standards. The Sustainable Agriculture Coalition is working with a coalition of farmers and groups to help USDA develop better standards.

Why is this so important?

USDA, in setting minimum standards for these claims, will largely transform the marketplace and will have far reaching implications for small and moderate-sized farms and ranchers who have made their livelihoods in such claims. USDA's claims could help -- or compromise -- the integrity of these labels and extinguish the promise these value-added markets hold for key segments of agriculture.

Have these standards already been put into place?

No. SAC is organizing meetings with USDA on each of the four label claims: antibiotic claims; hormone claims; free range; and grass-fed. The first of the four meetings was November 13th and addressed the antibiotic label claims. Representatives from the Keep Antibiotics Working Campaign Coalition, retail sector, marketing interests, animal rights groups and farmers and ranchers, were participants in the meeting. The second meeting was held February 11th and dealt with standards for the grass-fed label claim. In May, SAC will be organizing a meeting on standards dealing with the use of hormones.

Our goal is to influence the writing of strict, minimum standards for antibiotic label claims that maintain the integrity of the label, instill consumer confidence, and protect an important market for farmers using sustainable farming practices

For more information

Contact Ann Wright, Sustainable Ag Coalition, awright@msawg.org or 202/547-5754.

The Federal Register Notice for Standards for Livestock and Meat Marketing Claims, Dec. 30, 2002. The standards were printed in the Federal Register in December of 2002. Visit www.ams.usda.gov/lsg/stand/claim.htm.

What's wrong with the proposed standards?

The Sustainable Agriculture Coalition's position on "antibiotics" claims

1) "No antibiotics used" or "Raised without antibiotics"

We support this label claim and the proposed language and support its use as a zero tolerance standard. We support USDA moving forward with this label claim expeditiously. In anticipation of questions or concerns about the distinction between antibiotics and antimicrobials, we recommend that this label claim cover antibiotics (including synthetic analogs) as well as only those antimicrobials that are compounds defined by FDA as drugs, not sanitizers.

2) **"No subtherapeutic antibiotics"** and **"Not fed antibiotics"**

We do not support the use of these two label claims under any circumstances.

There is a range of opinion within our coalition on the immediate need for a label claim that provides for and explains the use of antibiotics for disease treatment. Some groups are opposed to a label that allows for a middle ground approach to the use of antibiotics, out of concern that it opens a loop hole for processors and producers to market meat raised under the routine use of antibiotics. Some groups are interested in pursuing a more intermediary label now, and others think it should be sidelined for now but discussed in detail at a later time. There is consensus, however, that should USDA decide at any point in the future to go forward with such a label claim, it should be direct claim about disease treatment. We recommend the following language: *Antibiotics used only for disease treatment of individual animals*. We also agree that this proposed language should be clearly understood as referring to antibiotics approved by FDA for disease treatment, and that the use of these or other antibiotics approved for feed efficiency, weight gain, disease prevention, disease control or other uses not directly and solely related to disease treatment would not be permitted.

3) **"No detectable antibiotic residue"**

We do not support the use of this label under any circumstances. We recommend that USDA verified "grass-fed" livestock adhere to a 100. This standard protects the integrity of the label "grass-fed" and allows farmers who have been raising livestock using a 100% standard to market a value-added product.

Our position on the "grass-fed" standard

Many farmers who raise and market grass-fed meat adhere to a 100% standard. Unfavorable weather conditions sometimes require supplemental feeding using stored "forage" either in the form of hay or grass, but not corn or other grains. This basic production decision translates into an important marketing tool for farmers and ranchers who want to distinguish their grass-fed livestock from a grain-fed animal. When USDA sets minimum standards for grass-fed at 80% of an animal energy source, they obscure the differences between these distinctions and take away an important marketing tool that allows farmers to profit from a premium market. Farmers are left without a meaningful marketing tool and consumers are left with a label that has little meaning.

While the 80% energy source requirement might not accommodate most feedlot beef, it does allow for a considerable amount of grain feeding. If grain feeding is concentrated during finishing, animals could be fed 85% grain for 60 days and still fall within the proposed guidelines for a "grass-fed" label. This is clearly not what consumers purchasing "grass-fed" products expect. Also, one of the marketable differences between grain fed and grass-fed meat lies in the CLA fat contained in the meat. While 60 days is less than the standard finishing period for feedlot meat, it would be enough to seriously compromise the health benefits attributed to grass-fed meat.

We recommend that USDA verified "grass-fed" livestock adhere to a 100. This standard protects the integrity of the label "grass-fed" and allows farmers who have been raising livestock using a 100% standard to market a value-added product.