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USDA Is Soliciting Comments For A Grass Fed Cattle Certification Program As Ranchers Attempt To Satisfy Consumer Demand Jose G. Peña, Professor and Extension Economist-Management

USDA is again soliciting public comments to review the feasibility of establishing a grass fed certification program for ruminant livestock. The industry is trying to diversify products to satisfy consumer demand.

Consumer demand for grass-fed, natural, and organic livestock products is increasing rapidly and special segments of the food industry are evolving to satisfy this demand. Consumer advocates of grass (forage) fed beef contend that the common practice of fattening livestock with feed consisting largely of corn before slaughter is unnatural for the animal and leads to fatty, less healthful meat. The grass-fed standard is different from beef labeled organic, which requires adherence to a long list of other regulations. Beef can be organic without being grass-fed and vice versa.

Some ranchers would like to distinguish their products in the marketplace, but an agreed upon standard must be established.

But, while the food industry may be poised to develop market shares and profits, developing standards for the production of these specialty products that are acceptable to the livestock industry while providing a market standard for consumers will be difficult and expensive. While the food industry wants to capture this specialty, under served, market niche, an increase in the customer base for grass-fed beef will be predicated on acceptability of this product in relation to traditional beef, chicken, and pork. Consumer research shows the priority for beef-buying decisions are for taste and eating satisfaction. Most agree that consistency is the key to substantiate market promotion claims to serve a special market, such as grass (forage) fed beef. This means standards, but there has been wide disagreement as to what should constitute a standard, especially in terms of percent grass (forage) in the diet of ruminant livestock being marketed for "grass-fed" labeling.

## **Original Public Comments**

As multiple consumer-driven organizations began to seek USDA certification or verification of a grass (forage) fed program several years ago, USDA determined it would be beneficial to establish minimum standards for common production and marketing claims. Proposed U.S. Standards for grass (forage) fed, Livestock and Meat Marketing Claims were published as a notice and request for comments, in the December 30, 2002, Federal Register (67 FR 79552).

By the close of the initial comment period, USDA had received 369 formal comments from a wide array of participants such as: consumers, academia, trade and professional associations, national organic associations, consumer advocacy associations, meat product industries, and livestock producers. While only three comments received were in general support of the standard, comments were technically "all over the board" with very little common ground to develop a standard. Commenters were not only strongly concerned about the percent of grass and forage but also requested further clarification of the forage definition. Many commenters requested that the standard provide consumers with the confidence that they are purchasing what is represented on the label. A few comments stated only grass and no stockpiled or stored forages should be permitted for a grass (forage) fed labeling claim. By far, most comments suggested that the percentage of grass and forage in the standard be greater than the 80 percent originally proposed, from 100 percent grass or forage, to various levels of 90, 95, 98 and 99 percent grass and forage as the primary energy source.

Some commenters suggested that animals be on 100 percent forage diet with the exception of the winter season when free-standing forage is unavailable, at which time the animals can be fed 85 percent forage derived diet. Other comments addressed whether the claim's purpose is to market the raising practices or to market the resulting meat characteristics of the grass (forage) fed animal. Others suggested that labels include items such as "grass (forage) fed livestock results in meat that has higher desirable levels of Conjugated Linoleic Acid (CLA) and omega-3 fatty acids."

USDA, in listening sessions and in response to the extensive comments received, indicated that emphasis should be placed on the diverse grass feeding regimes across the nation. USDA determined the most appropriate way to integrate the grass (forage) fed claim into practical management systems and still maximize or keep the purest intent of grass and/or forage based diets was by changing the standard requirements to read that grass and/or forage shall be 99 percent or higher of the energy source for the lifetime of the animal, with the exception of milk consumed prior to weaning.

Now, the Agricultural Marketing Service (AMS) is soliciting comments to establish a voluntary standard for a grass (forage) fed marketing based on a revised standard, generally incorporating the concepts mentioned above. If adopted, the proposed standard would incorporate revisions made as a result of comments received to adopt proposed standard published earlier. Once a voluntary grass (forage) fed standard is established and verified by USDA, verification of this claim will be accomplished through an audit of the production process by AMS.

The future growth of the grass-fed beef enterprise with the validity and consistency supplied by a process verification label from USDA will be determined by buying decisions which have a high priority for quality and taste. The industry should strive to insure that in creating a labeling standard and verification process, that the program does not diminish and/or detract from the current process for most of the meat consumed.

**NOTE:** DATES: Comments must be received on or before August 10, 2006. ADDRESSES: Written comments, suggestions, and other input may be submitted to Martin E. O'Connor, Chief, Standardization Branch, Livestock and Seed Program, AMS, USDA, Room 2607–S, 1400 Independence Avenue, SW., Washington, DC 20250–0254. Comments may also be sent by facsimile to (202) 720–1112, by electronic mail to <u>marketingclaim@usda.gov</u>, or via the Internet at <u>http://www.regulations.gov</u>. Comments should refer to Docket No. LS–05–09. All comments received will be made available for public inspection at the above physical address during regular business hours (8 a.m.–4:30 p.m.) and will be posted on the Internet at <u>http://www.ams.usda.gov/lsg/stand/claim.htm.</u> A copy of this proposed voluntary United States Standards for Livestock and Meat Marketing Claim, Grass (Forage) Fed Claim, is available through the above physical address or by accessing the Web site at <u>http://www.ams.usda.gov/lsg/stand/stpubs.htm.</u>