

Labeling Meat in Kentucky

A farmer's guide to labeling USDA
inspected meat products for direct sale.

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Questions about labeling and inspection are quite common for farmers who are considering direct meat marketing. Many farmers have indicated that they could sell their meat if they could obtain a proper label. Correctly labeled USDA Inspected meat can be sold almost anywhere. Producers can sell individual cuts from their freezer, at a farmer's market (check with the local health department first), or wholesale to restaurants, grocery stores, etc. Without the proper USDA label, farmers can only legally sell live animals, leaving processing up to the buyer.

This publication is not intended to serve as a single source for all labeling questions. Rather, it is intended to provide introductory information about labeling requirements and contact information for those requiring more thorough explanations. Many of these requirements are subject to change from time to time, and government programs are constantly being refined. Questions about the information presented in this publication should be directed to Kenny Burdine at (859) 257-7273 or Tess Caudill at (502) 564-3956. For more information about labeling regulations, exemptions, and processes, contact the USDA directly. Phone numbers are available throughout this publication.

General Labeling Requirements

Labels on all meat and poultry products are required to be on the principal display panel (PDP). The principal display panel refers to that part of the package that will probably be seen first by the buyer. Meat packages are seldom perfectly shaped, so the general rule is that the principal display panel should be 40% of the total surface area of the container.

The information panel is defined as the surface to the right of the principal display panel. When sufficient space exists, all labeling should be found on one panel or the other. However, when there is not sufficient space, information may be placed on both panels. For example, on small packages that require ingredient listings, it would be acceptable to place the ingredients on the information panel and place the rest of the information on the principal display panel.

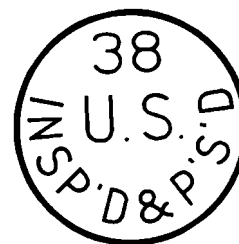
Labels of meat products are to include the following items:

- 1. Name of the product.** The name of the product should imply exactly what is contained if no common name is known for the product. If the product is prepared by smoking, salting, etc. that should be described on the label unless the name of the product or the manner of the packaging implies that the product was so prepared.
- 2. Ingredients.** This is only needed if the product is composed of more than one ingredient, so this is irrelevant for most fresh meat products. However, products like sausage fall into this category. This list of ingredients must show common names of all ingredients in descending order of their predominance. Definitions of certain ingredient terms may be found under Title 9, Section 317.2 of Code of Federal Regulations.

3. Name and place of business of the processor or distributor. Labels should show the name of the manufacturer, packer, or distributor and their city, state, and zip code. If the establishment is not listed in a city or telephone directory, the street address should also be included.

4. Statement of net quantity of contents. The amount by weight should appear on all packages that are sold at retail. The lettering should be in boldface print or type and in distinct contrast to other writing on the container. The letters should be a minimum of 1/16 inch on packages with a principal display area of 5 square inches or less. For a principal display area between 5 square inches and 25 square inches, the lettering should be no less than 1/8 inch. The statement should appear in the bottom 30% of the label.





5. Official Inspection Legend. The official USDA inspection legend should appear on each label. The official establishment number of the processor should appear inside the USDA legend.



6. Handling Statement. The handling statement, such as "keep refrigerated", "keep frozen", ect. is required on the label of a packaged product to indicate that the product must have special handling to maintain its wholesome condition.

Safe Handling Instructions

This product was prepared from inspected and passed meat and/or poultry. Some food products may contain bacteria that could cause illness if the product is mishandled or cooked improperly. For your protection, follow these safe handling instructions.

-  Keep refrigerated or frozen. Thaw in refrigerator or microwave.
-  Keep raw meat and poultry separate from other foods. Wash working surfaces (including cutting boards), utensils, and hands after touching raw meat or poultry.
-  Cook thoroughly.
-  Keep hot foods hot. Refrigerate leftovers immediately or discard.

7. Safe Handling Instructions. Safe handling instructions are to accompany all meat or meat products for retail sale. Most processors have stickers that meet all requirements of the safe handling instructions. If needed, exact wording of the statement can be found in section 317.2 of Title 9.

Information on general labeling requirements can be obtained from a local USDA inspector or by calling the USDA Food Safety Inspection Service (FSIS) at (202) 205-0623. (Title 9, Section 317.2 of the Code of Federal Regulations)

Generic Approval

Most USDA inspected processing plants have a pre-designed label under which all inspected meat products can be legally sold. However, many producers are interested in designing their own label to help differentiate their meat products from others. While the process of label approval may seem overwhelming, it is not as difficult as one might think. Many producers may be able to utilize the USDA's generic approval system. Generic approval is a final label that can be used without further authorization

from FSIS. A single ingredient or multi-ingredient product that is typically inspected by the USDA may qualify for generic approval. As long as the label bears no special claims, guarantees, foreign language or nutrition facts, and contains all mandatory features previously mentioned, the label does not have to be pre-approved by the USDA.

However, all generically approved labels must be kept on file by the USDA processing facility. If a producer uses more than one facility, all facilities must have the label on file. The USDA will select generically approved labeling samples from the records of official establishments to verify compliance.

To determine if your product qualifies for generic approval, consult the local USDA inspector or contact a USDA labeling reviewer at (202) 205-0623. (Section 381.133 Generic Approved Labeling)

Specific Labeling Claims

The labeling process becomes more difficult when producers want to make specific claims about their products. It is also important to note that one may be making a nutritional or production claim without realizing it, as many words have specific meanings that require verification by the USDA. FSIS has a publication entitled “Meat and Poultry Labeling Terms” that defines certain words as seen by the USDA. When in doubt, contact the Food Safety and Inspection Service.

To make nutrient claims about a product such as “lean” or “low fat” the claim must be verified at the producers expense, and the producer must have documentation that the product meets the requirements for the definition. For more information on this type of claim, visit the FSIS website at www.fsis.usda.gov or call Mike Donovan at (202) 205-0623.

LEAN
BEEF

Producers who wish to use words such as “natural”, “humanely produced” or “free range”, must contact the Labeling and Review Branch of the USDA to make an animal production claim. Producers will be asked to submit an Operational Protocol that outlines their production practices. Since these claims vary with each situation, the Labeling Review Branch urges producers to contact them at (202) 205-0623 if they have questions.

FREE-
RANGE
CHICKEN

In addition to verifying the claims being made, a producer will have to submit a sample label sketch and a label application to the FSIS. The application will ask for product formula, processing procedures, etc. There is no charge for this service, and the FSIS will contact the producer to inform them if their label was approved. This process is required for producers intending to make a nutrient claim, an animal production claim, or a geographical origin claim.

Special Labeling Programs

USDA Process Verification Program

The USDA Process Verification Program is another option for producers who wish to make claims about the production of their livestock, and participation in the program can assist producers who wish to make animal production labeling claims. Meat that is produced under this program can be labeled with a “USDA Process Verified” shield.

The underlying principle behind the program is that a third party verifies that a documented quality control system is being followed. In order to become process verified, the producer must submit a manual to the USDA that outlines all practices involved in production of the animals. The manual itself will be thoroughly audited and possibly modified. Then, the Meat Grading and Certification Branch of the USDA will review the quality management system through a compliance assessment.

Once the assessment is successfully completed, the producer may begin using the “USDA Process Verified” shield. The shield may be used on promotional material and on retail packaging when a complete description of the process is included. There are a wide range of process verified programs in use today. Some examples include: Nebraska Corn Fed Beef, Belle Brook Belgian Blue, and Certified Piedmontese Beef. Further information on the program can be found on the USDA Agricultural Marketing Service website at www.ams.usda.gov.

The producer must also undergo third party audits to ensure that they are following the practices outlined in the manual. The cost of the program is the responsibility of the producer. Further information about process verification may be obtained by contacting Mark Bradley at (202) 720-1124.

Free Farmed Certification

Another option for producers to differentiate their products is the new “Free Farmed” certification program. This is an American Humane Association (AHA) program that is audited by the USDA. The program is intended to offer consumers meat products from animals that have been treated according to animal welfare standards developed by the American Humane Association.

The fee based service is available to producers, processors, and distributors. It is administered by Farm Animal Services (FAS), which is an affiliate of the AHA. Parties interested in Free Farmed Certification should contact the FAS at (202) 543-2335 to obtain the necessary documents. After the necessary documents



have been completed and sent to FAS, an on-site inspection will be conducted. The auditor will then contact the USDA Agricultural Marketing Service who may send an auditor of their own.

Applicants that meet all requirements of the AHA will be issued a certificate of approval valid for one year and they may use the Free Farmed Seal. The FAS will contact all participants before their certification expires. The participants must submit any revisions to FAS and be re-assessed in order to maintain approved status.

Producers will also be required to maintain a program manual with updated information on animal housing, nutrition, husbandry practices, health plans, emergency procedures, casual slaughter policy and other information that documents their compliance with AHA Animal Welfare Standards. For more information on the Free Farmed Program, visit www.freefarmed.org.

Labeling Meat as Organic

Many producers who are interested in direct meat marketing are interested in marketing organic meat products. Prior to December of 2000, the USDA did not have a definition of “organic”. Products were allowed to be labeled “organic” only if they were certified organic by a third party and the label indicated the name of the certifying agency.

However, on December 21, 2000 the USDA released national standards for the production, handling and processing of organically grown agricultural products. The new standards offer a national definition for the term organic, and give specific methods, practices and substances that can and cannot be used in producing and handling organic crops or livestock.



According to the USDA’s press release on this issue, “ All agricultural products labeled organic must originate from farms or handling operations certified by a state or private agency accredited by USDA. Farms and handling operations that sell less than \$5,000 worth per year of organic agricultural products are exempt from certification.” Exempt operations will still be expected to meet all organic regulations. Farmers and handlers have 18 months to comply with the national standards.

Since 1990, the Kentucky Department of Agriculture has served as a certifying agency for organic products. The department plans to become an accredited agency under the new USDA standards and continue their organic certification program. For information about certification through the department contact Hope Crain at (502) 564-4696 or visit the department’s website at www.kyagr.com. For additional information on the National Organic Standards, contact Keith Jones with the USDA Agricultural Marketing Service at (202) 720-3252 or visit the USDA’s website at www.ams.usda.gov/nop/.



Nutritional Labeling

Nutritional labeling refers to the information that is found on most any food packages entitled “Nutritional Facts”. This panel contains items such as calories, vitamins, fat content, and serving size. The Federal Nutrition Labeling and Education Act of 1990 mandates nutritional labeling for all food products manufactured in the United States. However, there is an exemption to this requirement under which most small meat marketers in Kentucky should comfortably fall.

The “small business exemption” (section 403 (q)(5), Federal Food Drug and Cosmetic Act) establishes an exemption from mandatory nutrition labeling for low volume food products from small businesses. A firm with fewer than 10 full time employees that produces less than 10,000 units of product for sale each year is exempt from nutritional labeling requirements. Furthermore, a firm with less than 100 full time employees that produces less than 100,000 units of product each year is also exempt. However, operations falling into this second category must apply for an exemption. To request the application for exemption, send correspondence to:

Office of Food Labeling, Center for Safety and Applied
Nutrition
Food and Drug Administration
200 C. Street SW
Washington, D.C. 20204

Nutrition Facts	
Serving Size ½ cup (114g)	
Servings Per Container 4	
Amount Per Serving	
Calories 90	Calories from Fat 30
<hr/>	
	% Daily Value*
Total Fat 3g	5%
Saturated Fat	0%
Cholesterol 0 mg	0%
Sodium 300mg	13%
Total Carbohydrate 13g	4%
Dietary Fiber 3g	12%
Sugars 3g	
Protein 3g	
<hr/>	
Vitamin A 80%	* Vitamin C 60%
Calcium 4%	* Iron 4%
* Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs.	
	Calories 2,000 2,500
Total Fat	Less than 55g 60g
Sat Fat	Less Than 20g 25g
Cholesterol	Less Than 300mg 300mg
Sodium	Less than 2,400mg 2,400mg
Total Carbohydrates	300g 375g
Dietary Fiber	25g 30g
Calories per gram:	
Fat 9 * Carbohydrate 4 * Protein 4	

Useful Definitions

Free Range or Free Roaming-

Producers must demonstrate to the FSIS that the animal has been allowed access to the outside.

Natural-

A product containing no artificial ingredient or added color and is only minimally processed may be labeled natural. The label must explain the use of the term natural (such as— no added colorings or artificial ingredients).

No Hormones (pork or poultry)-

Hormones are not allowed in raising hogs or poultry. Therefore, the claim “no hormones added” cannot be used on the label of pork or poultry unless it is followed by a statement that says “Federal regulations prohibit the use of hormones”.

No hormones (beef)-

The term “no hormones administered” may be approved for use on the label of beef products if sufficient documentation is provided to the FSIS by the producer showing no hormones have been used in raising the animal.

No antibiotics (red meat and poultry)-

The term “no antibiotics added” may be used on labels for meat or poultry products if sufficient documentation is provided by the producer to the FSIS demonstrating that the animals were raised without antibiotics.

Informational Contacts

Mark Bradley (202) 720-1124
USDA Process Verified Program

Kenny Burdine (859) 257-7272 ext. 229
University of Kentucky

Tess Caudill (502) 564-3956
Kentucky Department of Agriculture

Hope Crain (502) 564-4696
Kentucky Department of Agriculture

Mike Donovan (202) 205-0623
USDA Food Safety Inspection Service

Keith Jones (202) 720-3252
USDA Agricultural Marketing Service

American Humane Assoc. (202) 543-2335

FSIS Label Review Branch (202) 205-0623

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