

Animal Production Claims

Outline of Current Process

- I. Validation Process for Animal Production Claims
 - a. Evaluate labeling claims
 - b. Provide or deny labeling approval/return for additional supporting documentation
 - c. Update and maintain files
 - d. Update and maintain database

- II. Evaluation of labeling claims

Labeling applications are submitted in triplicate accompanied by documentation for supporting all claims used on the label.

Examples of supporting documentation relied upon to support claims:

- a. Operational protocol, describing in detail the production practices employed.
- b. Affidavits and testimonials.
- c. Feed formulas.
- d. Certificates, e.g., certified organic ingredients

ANIMAL PRODUCTION CLAIMS REVIEW

1. Evaluate the claim (i.e., what are they claiming). Check the file or producer database, the label claim may have been approved for this producer before.
2. Review the testimonial. It must be signed and it must state that they are not doing the things they say they aren't doing on the label.
3. Review the detailed protocol. Ensure that the protocol describes practices that support the accuracy of the claims that are made. Feed formulations must be included and reviewed to ensure that they do not include substances not permitted by the claim. Ask the producer to explain what each substance is if it is not clear to you.
4. If the claims are approvable but the protocol or testimonial lacks sufficient information to support the claim, contact the producer directly (by phone to save time). Explain what is needed to make the protocol sufficient. Hold the label for a reasonable period of time while the producer provides the additional necessary information.
5. If the claims are not approvable, or the producer cannot provide the additional information to support the claim, return the label unapproved.
6. Claims in secondary products (e.g., Hotdogs, "beef used raised without hormone implants or antibiotics") must be stated exactly as they are on the supplier's primary label.

COMMONLY APPROVED CLAIMS

RAISED WITHOUT ADDED HORMONES, RAISED WITHOUT ANTIBIOTICS, NOT FED ANIMAL BY-PRODUCTS, FREE RANGE, FREE ROAMING, GRASS FED, CORN FED, GRAIN FED, CERTIFIED ORGANIC (BY CERTIFYING ENTITY).

Claims about the non-use of animal by-products have become popular lately due to fears about BSE.

UNAPPROVABLE CLAIMS

ANTIBIOTIC FREE, HORMONE FREE, RESIDUE FREE, RESIDUE TESTED, NATURALLY RAISED, NATURALLY GROWN, DRUG FREE, CHEMICAL FREE, ORGANIC, ORGANICALLY RAISED.

Hormones are only approved for use in beef cattle and lamb production. They are not approved for use in poultry, hogs, veal calves or exotic, non-amenable species. Therefore, the phrase "no hormones administered" on a chicken label cannot be approved unless it is followed (directly) with the statement "Federal regulations prohibit the use of hormones in poultry."

Remember that you are dealing with a producer, farmer, and feedlot operator as opposed to plant management. They need to understand that the label is approved for use at a particular federally inspected establishment. It does not belong to the producer of the animals. If he changes establishments in the future, he must seek a new label approval.

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