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VIA FEDERAL EXPRESS

FSIS Docket Clerk
Department of Agriculture
Food Safety and Inspection Service
Room 2534 South Building
1400 Independence Ave., SW
Washington, D.C. 20250-3700

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Re: Request to Repeal the Definition of “Spring Lamb” in 9 C.F.R. § 317.8(b)(4)

Dear FSIS Docket Clerk:

On behalf of The Lamb Company (the “Company”), we hereby respectfully submit this petition under 9 C.F.R. Part 392 and 7 C.F.R. § 1.28, among other provisions of law.

I. Actions Requested

The Lamb Company respectfully requests that the Food Safety and Inspection Service (“FSIS”) take the following actions:

- Repeal the definition of “spring lamb” in 9 C.F.R. § 317.8(b)(4) (the “spring lamb regulation”) because the definition is obsolete and unnecessary.
- Exercise its enforcement discretion to permit lamb products to be marketed *on a year-round basis* with labeling that includes the term “spring lamb,” provided that the labels are otherwise in compliance with the Agency’s laws, regulations, and policies.

The Lamb Company notes that its request to repeal the spring lamb regulation is consistent with the intent of Executive Order 13771, which directs federal agencies to identify at least two prior regulations for elimination for each new regulation issued.¹ The Company further notes that its request is consistent with the USDA’s regulatory reform initiatives because, among

¹ Executive Order 13771, Reducing Regulation and Controlling Regulatory Costs, 82 Fed. Reg. 9339, 9339 (Feb. 3, 2017).

other things, the spring lamb regulation is (i) outdated and unnecessary and (ii) imposes costs that exceed any purported benefits.²

II. Statement of Interest

The Lamb Company is a North American supplier of lamb and other premium naturally raised proteins. It is the owner of the registered U.S. trademark “New Zealand Spring Lamb,” and the Company has made a significant investment in developing this brand for over two decades. However, during certain months of the year, the Company is unable to market its products in the United States under its “New Zealand Spring Lamb” brand because this labeling is not consistent with what we respectfully submit are the outdated and arbitrary season-based requirements of the spring lamb regulation. Instead, to avoid having to pull product from the U.S. market during certain months of the year, the Company must market its products under two different sets of labeling based on the time of the year, even though the characteristics of these products are otherwise the same. This practice not only imposes additional packaging and inventory costs upon the Company, but it also risks creating confusion among consumers and retail clients over the identity of the Company’s products. Further contributing to this confusion, the Company is permitted to market its products in Canada under its “New Zealand Spring Lamb” brand during all twelve months of the year.

III. Statement of Grounds

A. The Original Basis and Purpose of the Spring Lamb Regulation is Unclear but Appears to be Largely a Historical Artifact

To the Company’s knowledge, the public record associated with the issuance of the spring lamb regulation neither explains the original purpose of the regulation nor describes the facts and data that supported its issuance. The spring lamb regulation appears to have been issued by the War Food Administrator in 1945 as part of a package of amendments to the meat inspection regulations.³ The authority conferred upon the War Food Administrator to issue such regulations derived in part from certain executive orders issued during World War II.⁴

² On December 21, 2018, The Lamb Company submitted comments to the docket of the proposed rule entitled “Identifying Regulatory Reform Initiatives” requesting that USDA repeal 9 C.F.R. § 317.8(b)(4). *See* 82 Fed. Reg. 32649, 32649-32650 (Jul. 17, 2017) (Exhibit 1).

³ 10 Fed. Reg. 3316, 3335 (Mar. 29, 1945).

⁴ *Id.* at 3316.

Shortly after the spring lamb regulation was issued, the office of the War Food Administrator was terminated, and its functions were transferred to the Secretary of Agriculture.⁵ By executive order, all regulations issued by the War Food Administrator were to “continue in full force and effect unless and until modified or revoked by the Secretary of Agriculture.”⁶ The spring lamb regulation was not subsequently modified or revoked by the Secretary.⁷ It is unclear, however, whether the Secretary specifically considered the ongoing applicability of these war-time regulations—including the spring lamb regulation—when deciding that this package of amendments would remain in effect at the conclusion of the war.

Notwithstanding this uncertainty, the historical context surrounding the issuance of the spring lamb regulation suggests that its original basis may relate, at least in part, to a disagreement between the spring lamb industry and federal regulators over the ceiling prices for lamb products during World War II. In a statement submitted to Congress in 1944 on the question of price controls for lamb products, the industry contended that the Office of Price Administration (“OPA”) should set the ceiling price for spring lambs at 15 percent above the average price for fed lambs.⁸ In support of its position, the industry provided price data showing that spring lambs typically commanded a 15 percent premium in the market relative to fed lambs.⁹ At the time, spring lambs were slaughtered at 5 to 6 months of age, whereas fed lambs were slaughtered at 10 to 12 months of age.¹⁰ The industry also claimed that the Agricultural Marketing Service (“AMS”) had “tentatively agreed to stamp (roll) lambs ‘spring’ at the time of grading”¹¹—an action presumably intended to facilitate the marketing of spring lambs at the higher ceiling price that the industry was requesting. However, it is unclear whether AMS ever adopted this practice.

⁵ 10 Fed. Reg. 8087, 8087 (Jul. 3, 1945).

⁶ *Id.* at 8090.

⁷ On September 19, 1945, the Secretary of Agriculture redesignated the heading of Chapter II of Title 9 (which contained the spring lamb regulation) as “Production and Marketing Administration (Livestock Branch)”. 10 Fed. Reg. 11981, 11981 (Sep. 21, 1945). On September 27, 1946, the Acting Secretary of Agriculture further redesignated subchapter B and Parts 251-279 of Title 9 (which contained the spring lamb regulation) as subchapter A—Meat Inspection Regulations, Parts 1-29. 11 Fed. Reg. 11189, 11189 (Oct. 2, 1946).

⁸ *H.R. 4376 – A Bill to Extend the Period of Operation of the Emergency Price Control Act of 1942: Hearing Before the H. Comm. on Banking and Currency, 78th Cong. 2037 (May 17, 1944) (hereinafter Extension of Emergency Price Control Act Hearing)* (excerpt attached as Exhibit 2).

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.* at 2037-2038.

OPA, however, did not believe that spring lambs warranted a separate premium above the upper tier of the existing ceiling price for lamb.¹² In support of its position, OPA contended that “it is impossible for the consumer to know a genuine spring lamb from a fed lamb” and that “any overage for genuine spring lambs during this 2- or 3-month period in which they market would lead to a general increase in upgrading in the price of lamb over the country at retail.”¹³ OPA further asserted that there was “a difference of opinion” as to whether the meat from spring lambs had different characteristics from the meat of fed lambs and that “these differences are extremely difficult to define.”¹⁴ Rather than focus on the purported differences between spring lamb and fed lamb, OPA explained that “[a] lamb is generally defined as any [sheep] under a year old” and that “the test of a lamb, technically, is whether the joints break properly.”¹⁵

The historical context in which the spring lamb regulation was issued suggests that its original purpose may have been more directed at addressing industry concerns over the war-time prices of spring lamb products than at protecting U.S. consumers from economic deception. In this regard, it should be noted that the historical use of the terms “Spring Lamb” and “genuine spring lamb” peaked during the period surrounding World War II (when the regulation was issued) and then abruptly declined, suggesting that the significance of these terms was closely tied the events of that time and thus not relevant today.¹⁶

¹² *Id.* at 2040 (“[The Kentucky Spring Lamb Association] feel[s] that they should have a premium above the double A price because their lambs are so-called genuine spring lambs. We have investigated that very carefully and we could not grant them that overage.”).

¹³ *Id.* at 2041.

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ See Google Books Ngram Viewer, <https://books.google.com/ngrams> (search terms = “Spring Lamb” and “genuine spring lamb”; corpus of books = “American English”) (Exhibit 3-1). A similar usage pattern was observed in the time period in question when the “English” corpus of books was searched. Exhibit 3-2. However, a more complex usage pattern was observed when a “case-insensitive” graph was generated from the American English corpus of books, potentially because the more general phrase “spring lamb” is used in a broader set of contexts. Exhibit 3-3 (Note, the message on the graph explaining that the “[s]earch for ‘genuine spring lamb’ yielded only one result” refers to the number of variations of the input phrase “genuine spring lamb” and not to the number of times that the phrase was mentioned in this corpus of books.).

B. Whatever Its Original Purpose, the FSIS Definition of “Spring Lamb” Is Now Obsolete

1. The Definition is Outdated Because It Does Not Reflect Modern Industry Practices

Regardless of its original purpose, the spring lamb regulation is currently at odds with modern industry practices. Under the spring lamb regulation, the terms “spring lamb” or “genuine spring lamb” apply only to “carcasses of new-crop lambs slaughtered during the period beginning in March and terminating not beyond the close of the week containing the first Monday in October.”¹⁷ Historically, this season-based definition may have functioned as a proxy for a subcategory of lamb products that were produced from younger animals.¹⁸ Today, however, modern industry production practices have rendered this definition obsolete, as quality lamb is available to U.S. consumers on a year-round basis. Indeed, as USDA has acknowledged, the term “spring lamb” comes from “olden times” and “[t]oday with more protected animal husbandry conditions, enjoying ‘lamb’ is not confined to a particular season of the year.”¹⁹

More specifically, the definition of “spring lamb” in the FSIS regulation is outdated because it is inconsistent with modern domestic production practices. While domestic lamb production remains concentrated during the first five months of the calendar year, the environmental conditions in large lamb producing states such as California and Texas are favorable to fall and winter lambing operations which extends the domestic production season to most of the year.²⁰ Moreover, in comparison to traditional, seasonal production systems, modern accelerated lamb production systems are capable of providing a consistent, year-round supply of

¹⁷ 9 C.F.R. § 317.8(b)(4).

¹⁸ See *Extension of Emergency Price Control Act Hearing*, *supra* note 8, at 2037 (indicating that, historically, spring lambs were sold when 5 to 6 months old whereas fed lambs were sold when 10 to 12 months old) (Exhibit 2); see also *Agriculture, Rural Development, and Related Agencies Appropriations for 1984: Hearing Before the H. Subcomm. on Agriculture, Rural Development, and Related Agencies*, 98th Cong. 63 (Feb. 16, 1983) (FSIS “standards do regulate the labeling of ‘spring lamb’ and ‘genuine spring lamb’ based on the age of the lamb. (emphasis added)) (excerpt attached as Exhibit 4).

¹⁹ USDA, *Lamb from Farm to Table*, https://www.fsis.usda.gov/wps/portal/fsis/topics/food-safety-education/get-answers/food-safety-fact-sheets/meat-preparation/focus-on-lambfrom-farm-to-table/ct_index (last visited May 24, 2019) (hereinafter *Lamb from Farm to Table*) (Exhibit 5).

²⁰ American Lamb Board, *A Review of Current Information: Seasonality of the US Lamb Industry*, at 1, <http://lambresourcecenter.com/wp-content/uploads/2018/07/ALB-Seasonality-White-Paper-REVFINAL-07-11-18-1.pdf> (hereinafter *Seasonality of the US Lamb Industry*) (Exhibit 6).

domestic lambs while at the same time increasing the efficiency of the overall lamb operation.²¹ These features of modern, domestic lamb production are inconsistent with the season-based definition of spring lamb embodied in the FSIS regulation.

The definition of “spring lamb” is also outdated because it is inconsistent with the types of producers currently supplying the U.S. lamb market. At present, approximately one-half of the total lamb meat supply in the United States is imported from countries where production is concentrated in a different period of the year than domestic production due to factors such as geography and climate.²² Specifically, imports of lamb produced in the Southern Hemisphere—where spring occurs at the opposite time of the year than in the United States—account for a significant share of the total U.S. lamb supply and further increase the year-round availability of lamb to U.S. consumers.²³ The definition of “spring lamb” in the FSIS regulation is also inconsistent with the approach adopted by other countries, such as Canada, where only a single category of “lamb” products is recognized. Thus the regulatory definition of spring lamb is at odds with the modern reality that international lamb operations play a significant role in supplying lamb to the U.S. market.

Last, there is evidence suggesting that these modern industry practices are reflected in the expectations of lamb purchasers. For example, purchasers of lamb products, such as chefs and food service distributors, recognize that the traditional term “spring lamb” is outdated because young lamb is now available year-round in the U.S. market.²⁴ The sheep industry has also at times publicly discouraged use of the term “spring lamb” because quality fresh lamb has been available year-round in the United States for decades. According to one representative of the

²¹ American Lamb Board, *Increasing Your Lamb Crop Series: Accelerated Lambing Cycles*, at 1, <http://lambresourcecenter.com/wp-content/uploads/2016/11/ALB-Productivity-Fact-Sheet-ACCELERATED-LAMBING-CLREV-10-14-16.pdf> (Exhibit 7).

²² *Seasonality of the US Lamb Industry*, *supra* note 20, at 5-6 (Exhibit 6).

²³ From a seasonality perspective, international lamb production in the Southern Hemisphere generally mimics domestic production systems in California and Texas. *See Seasonality of the US Lamb Industry*, *supra* note 20, at 6 (Exhibit 6).

²⁴ *See* Julia Child, *Mastering the Art of French Cooking*, at 328 (2001) (“We can now buy large young lamb, 5 to 7 months old, all through the year.”) (Exhibit 8-1); David Burke and Judith Choate, *David Burke's New American Classics*, at 172 (2006) (“Leg of lamb was once enjoyed only in the spring when young lamb was brought to the market and was, therefore, often associated with Easter dinner. Then, improved breeding techniques brought young lamb to the market all year long, and leg of lamb moved from the special occasion treat to the everyday table.”) (Exhibit 8-2); Kimberly Lord Stewart, *Eating Between the Lines*, at 47 (2007) (“The term ‘spring lamb’ was important decades ago when lamb production peaked in the spring and lamb purchased in other seasons was usually sold frozen. Today this term is almost obsolete because of year-round processing.”) (Exhibit 8-3); *see also Lamb from Farm to Table*, *supra* note 19 (noting that “[m]ost lambs are brought to market at about 6 to 8 months old”) (Exhibit 5).

sheep industry, "[c]onsumers should not have to pay the higher prices that some butchers get by calling lamb 'spring lamb' at certain times of the year when there really is no difference."²⁵

There is also evidence that the traditional meaning of the term "spring lamb" has changed over time. As previously noted, the frequency with which the terms "Spring Lamb" and "genuine spring lamb" have been historically used peaked during World War II—when the spring lamb regulation was issued—and then abruptly declined, suggesting that the significance of these terms was closely tied to the events of that time.²⁶ Moreover, evidence now suggests that purchasers assign a similar meaning to the terms "spring lamb" and "lamb."²⁷ Indeed, lamb purchasers commonly understand the term "spring lamb" to simply mean lamb that is slaughtered at less than 12 months of age.²⁸ Importantly, this is the same meaning that purchasers assign to the more general term "lamb." For example, survey data indicates that lamb purchasers in the retail, food service, and purveyor segments of the market understand the term "lamb" to mean "a young sheep less than 12 months of age."²⁹ Thus, to the modern purchaser of lamb products, the terms "spring lamb" and "lamb" share a similar meaning: a young sheep slaughtered at less than 12 months of age. Such an understanding is consistent with modern marketplace practices where "lamb" is generally produced "from younger animals, typically less than a year old" and where "[m]ost lambs are brought to market at about 6 to 8 months old."³⁰

²⁵ See Florence Fabricant, *Time for Spring Lamb, But Does It Exist Or Not?*, N.Y. Times (Mar. 16, 1983), <https://www.nytimes.com/1983/03/16/garden/time-for-spring-lamb-but-does-it-exist-or-not.html> (Exhibit 9).

²⁶ See section III.A, *supra*.

²⁷ This may explain why the term "Spring Lamb" remains in use today, even though its traditional meaning is no longer relevant in today's market. See Exhibit 3-1.

²⁸ See *David Burke's New American Classics*, *supra* note 24, at 171 ("In America, most of the lamb we eat is labeled "spring lamb," which used to connote that the lamb was born in the fall to be sold in the spring; now it simply means that the lamb was butchered at under a year, preferably between 3 and 5 months for the tenderest lamb.") (Exhibit 8-2).

²⁹ See American Sheep Industry Association, National Lamb Quality Audit Strategy Workshop Summary (August 28, 2015), https://www.sheepusa.org/Newsmedia_WeeklyNewsletter_2015_August_August282015_NationalLambQualityAuditStrategyWorkshopSummary (last visited May 24, 2019); see also American Lamb Board, *Final Report: Preferences and Complaints associated with American Lamb Quality in Retail & Foodservice Markets*, at 12-13, 60-65 (April 2015) (excerpts attached as Exhibit 10).

³⁰ *Lamb from Farm to Table*, *supra* note 19 (Exhibit 5); see also Fabricant, *supra* note 25 (Exhibit 9) ("No regulation concerns the age or size of spring lamb beyond requiring that all lamb be less than 12 months old. Most lamb is slaughtered at five to seven months in the United States these days.").

2. FSIS Has Previously Acknowledged That the Definition of “Spring Lamb” May Need to Be Modified or Repealed

FSIS has previously acknowledged that the definition of “spring lamb” may need to be modified or repealed. Following enactment of 21 U.S.C. § 607(f), FSIS issued an advanced notice of proposed rulemaking (“ANPRM”) “to determine the type of labeling standards it should establish for lamb and mutton and their meat food products.”³¹ While the ANPRM primarily focused on labeling and grading standards for “lamb,” FSIS also requested comments on practical issues that could arise from implementation of the new provision. As relevant here, FSIS noted that, although there is no definition of “lamb” in the regulations, the term “spring lamb” is defined in 9 C.F.R. § 317.8(b)(4).³² FSIS thus questioned whether the definition of “spring lamb” should be “changed, *deleted*, or added to the [labeling] standard.”³³

In response to the ANPRM, the Agricultural Marketing Service (“AMS”) expressed concern that “any FSIS proposed rule on lamb labeling standards could significantly affect AMS programs and AMS service to the industry.”³⁴ And ultimately FSIS declined to propose a new rule on lamb labeling standards. Nonetheless, it is important to note that none of the comments submitted to the ANPRM docket—which included comments from both domestic and foreign lamb producers—expressed concern over FSIS modifying or repealing the definition of spring lamb.³⁵ The apparently uncontroversial nature of this proposal further suggests that the term “spring lamb” lacks significance to the modern lamb industry.

3. Repeal of the Spring Lamb Regulation Would Not Impact Any Other USDA Regulation or Policy

To the Company’s knowledge, repealing the spring lamb regulation would not impact any other USDA regulation or policy, including any FSIS policy or AMS grading standard. Apart from the definition of “spring lamb” in the FSIS regulation, none of the Department’s other regulations or policies make a distinction between the traditional categories of “lamb” and “spring lamb.”³⁶ For example, FSIS Directive 6100.2 provides post-mortem inspection

³¹ 62 Fed. Reg. 62271, 62271 (Nov. 21, 1997).

³² *Id.* at 62272.

³³ *Id.* (emphasis added).

³⁴ USDA, Labeling Standards for Ovine Carcasses, Parts of Carcasses, Meat and Meat Food Products, Docket No. 97-030A, at 5 (Nov. 21, 1997) (advance notice of proposed rulemaking; request for comments) (Exhibit 11).

³⁵ *See generally id.* at 6-62.

³⁶ To the Company’s knowledge, the only other reference to the term “spring lamb” occurs in a description of the term “unshorn pelts” provided on the Department’s website. *See* AMS, *Livestock, Poultry and Grain Meat Terms*, <https://www.ams.usda.gov/market-news/livestock-poultry-and-grain-meat-terms#U> (last visited May 24, 2019).

procedures for only “lambs” (young sheep) and “sheep.”³⁷ Similarly, the AMS grading standards for slaughter sheep recognize only three age groups of animals: lambs, yearlings, and sheep.³⁸ Moreover, in both contexts, “lambs” are defined as a general category of young sheep based on the criteria of age (generally less than 14 months) and/or indicators of maturity³⁹—criteria which avoid reliance on outdated indicia of age such as the month in which an animal is slaughtered. As such, repealing the spring lamb regulation is not expected to have an impact on any of the USDA’s other programs.

Additionally, should the spring lamb regulation be repealed, the final labels for any lamb product that includes the term “spring lamb” would continue to be regulated by FSIS. Specifically, new labels determined to contain “special statements and claims” would still need to be evaluated and approved by the FSIS Labeling and Program Delivery Staff (LPDS).⁴⁰ This label approval process further renders the spring lamb regulation unnecessary. Moreover, repealing the spring lamb regulation would not prevent lamb producers from using special statements and claims on their labels to differentiate their products in the market—claims such as “milk-fed” or “baby lamb”—provided that such claims were truthful and non-misleading.

Conclusion

As discussed in this petition, the definition of “spring lamb” in the FSIS regulation is outdated because it is not consistent with either modern domestic production practices or the role of international operations in supplying lamb to the U.S. market. It also is unnecessary given the

³⁷ FSIS Directive 6100.2 (Revision 1), at 15, 18, <https://www.fsis.usda.gov/wps/wcm/connect/1001245c-4b56-444c-bc03-8686ebb48b3e/6100.2.pdf?MOD=AJPERES>.

³⁸ AMS, *United States Standards for Grades of Slaughter Lambs, Yearlings, and Sheep*, at 3 (Jul. 6, 1992), https://www.ams.usda.gov/sites/default/files/media/Slaughter_Lambs%2C_Yearlings%2C_and_Sheep%5B1%5D.pdf (hereinafter *AMS Grading Standard for Slaughter Lambs*); see also AMS, *United States Standards for Grades of Lamb, Yearling Mutton, and Mutton Carcasses* (Jul. 6, 1992), at 3, https://www.ams.usda.gov/sites/default/files/media/Lamb%2C_Yearling_Mutton_and_Mutton_Standard%5B1%5D.pdf (“Ovine carcasses are classified as *lamb, yearling mutton, or mutton* depending upon their evidences of maturity as indicated by the development of their muscular and skeletal systems.” (emphasis added)).

³⁹ FSIS Directive 6100.2, *supra* note 37, at 15 (“A young sheep or lamb (ovine) carcass meets the following criteria: written documentation that the ovine is less than 14 months of age or the presence of a break joint (epiphysis) of the distal metacarpal bone of either foreleg.”); *AMS Grading Standard for Slaughter Lambs*, *supra* note 38, at 3 (“A lamb is an immature ovine, usually under 14 months of age, that has not cut its first pair of permanent incisor teeth.”).

⁴⁰ 9 C.F.R. § 412.1. The phrase “special statements and claims” is defined to include “claims, logos, trademarks, and other symbols on labels that are not defined in the Federal meat and poultry products inspection regulations or the Food Standards and Labeling Policy Book.” *Id.*

Agency's existing label approval process and imposes additional compliance costs on certain lamb producers which are unjustified in light of the lack of benefits provided by the regulation.

The Lamb Company respectfully requests that FSIS grant its petition by repealing the spring lamb regulation. In the interim, the Company requests that FSIS exercise its enforcement discretion to permit lamb products to be marketed *on a year-round basis* with labeling that includes the term "spring lamb," provided that such labels are otherwise in compliance with the Agency's laws, regulations, and policies.

We appreciate your prompt consideration of this matter, and the granting of the actions requested herein.

Sincerely,



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cc: Paul Kiecker, Deputy Administrator
Roberta Wagner, Assistant Administrator, Office of Policy and Program Development
Roselyn Murphy-Jenkins, Director, Labeling and Program Delivery Staff

EXHIBIT LIST

Ex. No.	Description
1	The Lamb Company, Comment Letter on Proposed Rule Entitled “Identifying Regulatory Reform Initiatives”
2	Excerpt from Hearing on Extending the Emergency Price Control Act of 1942
3	Graphs from Google Book nGram Viewer
4	Excerpt from Hearing on Agriculture Appropriations for 1984
5	USDA webpage: <i>Lamb from Farm to Table</i>
6	American Lamb Board, <i>A Review of Current Information: Seasonality of the US Lamb Industry</i>
7	American Lamb Board, <i>Increasing Your Lamb Crop Series: Accelerated Lambing Cycles</i>
8	Excerpts from Culinary Books
9	Florence Fabricant, <i>Time for Spring Lamb, But Does It Exist Or Not?</i> , N.Y. Times
10	American Lamb Board, <i>Preferences and Complaints associated with American Lamb Quality in Retail and Foodservice Markets</i> (2015 National Lamb Quality Audit)
11	USDA, Labeling Standards for Ovine Carcasses, Parts of Carcasses, Meat and Meat Food Products, Docket No. 97-030A (Nov. 21, 1997)