

March 23, 2016

Alfred Almanza  
Deputy Under Secretary  
Food Safety and Inspection Service  
U.S Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Deputy Under Secretary Almanza,

The undersigned organizations write to urge you to issue updated guidance for labels that use the term “grassfed.” This updated guidance should require that producers comply with the now revoked grassfed label claim standard established by the Agricultural Marketing Service (AMS).

AMS’s revocation of that label claim standard has contributed to confusion in the marketplace - to the detriment of grassfed producers and consumers. We greatly appreciate FSIS’ presence on the AMS stakeholder call and the agency’s commitment to updating guidance on animal raising claims in general, including grassfed. Through its forthcoming guidance, FSIS can provide clear direction to protect the integrity of the market, but it must seize the opportunity and resist calls to cheapen grassfed labeling claims.

FSIS staff has indicated that they plan to include language in the updated guidance that addresses the issues that were created by AMS’s revocation of their grassfed label claim standard. We strongly oppose any guidance that allows any label claim with the words “grassfed” for any product that does not at a minimum meet the definition within the now revoked AMS label claim standard. Such labeling would mislead consumers, to the detriment of grassfed producers.

Consumers seek out grassfed beef products for varied but specific reasons that include perceived environmental and health benefits. Almost all livestock is “grassfed” to some extent. Conventional producers raise livestock on a diet of approximately 80 percent grass (forage) and 20% grain. Numerous studies have shown, however, that meat from animals fed 99 or 100% grass tends to be higher in conjugated linoleic acid (CLA), long chain omega-3 fats, antioxidants and some vitamins. Grainfed diets markedly reduce the presence of CLAs and omega-3 fats compared to true grassfed cattle. Labeling claims should be clear and consistent to consumers. Percentage claims, such as “80% grassfed” or “90% grassfed” would mislead consumers and dilute the meaning of the term to “grassfed” to an extent that would threaten the livelihood of the farmers and ranchers who created the grassfed market.

In finalizing the guidance on animal production claims for FSIS approved labels, we urge you to clearly adopt the definition of grass fed included in the now revoked AMS grassfed label claim standard as the minimum requirement for all labels that use the term “grassfed.” Specific labels could be approved if they exceed the minimum standard, provided any such claims are truthful and not misleading. No labels, however, should be approved that use the term grassfed but fall short of the former AMS grassfed label claim standard definition, as they would be extremely misleading.

We greatly appreciate your attention to this important matter and thank you in advance for considering our recommendations.

Sincerely,

American Grassfed Association

Center for Rural Affairs

Consumer Federation of America

Consumer Reports

CROPP Cooperative | Organic Valley | Organic Prairie

Food Animal Concerns Trust

National Bison Association

National Farmers Union

National Sustainable Agriculture Coalition

Northeast Pasture Consortium

Western Organization of Resource Councils

cc: Deputy Under Secretary Brian Ronholm  
Deputy Assistant Administrator Rachel Edelstein  
Director Rosalyn Murphy-Jenkins