



December 5, 2016

Docket Clerk
USDA-Food Safety and Inspection Service
Patriots Plaza 3
1400 Independence Avenue, SW
Mailstop 3782, Room 8-163B
Washington, DC 20250-0268

Docket: FSIS-2016-0021-0001

RE: Documentation Needed to Substantiate Animal Raising Claims for Label Submission

Thank you for this opportunity to provide comment on the USDA Food Safety and Inspection Service's (FSIS's) recently released revisions to guidance on Documentation Needed to Substantiate Animal Raising Claims for Label Submission.

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing organic businesses across 50 states. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA strongly believes in the integrity of the organic certification process at USDA-Agricultural Marketing Service's National Organic Program that requires strict adherence to the federal standards at 7 CFR 205. We appreciate FSIS's recognition in this guidance that an organic claim must only be supported with a valid organic certificate, and no additional documentation is required. We also acknowledge that FSIS has recently updated its guidance on "non-GMO" claims on FSIS inspected meat and poultry products to recognize a valid organic certificate as the only documentation necessary to make a "non-GMO" claim on an organic product and that such a claim does not require an on-package reference to the federal regulation which prohibits GMO ingredients in organic products. This policy makes sense as organic certification requirements prohibit the use of any GMO ingredients (referred to as "excluded methods" at 7 CFR 205.2) in organic products or organic animal feed and organic claims, in general, do not require a specific reference to the USDA organic regulations.

In a similar fashion, we request that FSIS review the various animal raising claims detailed in this guidance and compare those to the requirements in the organic regulations. If a specific animal raising claim is a requirement under the organic regulations, then no additional documentation beyond a valid organic certificate should be necessary. For example, antibiotics are specifically prohibited for use in organic livestock raised for slaughter (7 CFR 205.238(c)(1)), organic livestock and poultry must be provided with year-round access to the outdoors (7 CFR 205.239(a)(1)), and organic livestock producers are specifically prohibited from administering livestock drugs, including hormones, for growth promotion (7 CFR 205.237(b)(1)). Organic producers should be able to characterize these attributes on packages without the need to provide documentation beyond a valid organic certificate. We strongly encourage FSIS to recognize the specific requirements contained in the USDA organic regulations at 7 CFR 205, and allow organic producers to make claims such as "raised without antibiotics," "raised without growth promotants" and "free range" without requiring additional documentation. We also encourage FSIS to maintain consistency with its guidance on "non-GMO" claims on organic products by not requiring an on-package reference to the specific federal regulation governing the claim.



We also recognize the need for FSIS to ensure that label claims accurately convey how an animal is raised, and that additional documentation may be necessary for certain claims on organic products. In the case of ruminant animals (cattle, sheep), organic regulations require that those animals obtain a minimum of 30% of their diet from grazing (7 CFR 205.237(c)(2)). Based on this requirement, organic beef and lamb should be allowed to be labeled as “pasture raised” without any additional documentation, but since only 30% of the animal’s diet must come from pasture, a “grass fed” claim on an organic package would warrant additional verification and documentation.

We support FSIS’s effort in ensuring truthful labeling of all meat and poultry products. However, we believe that FSIS revisions to its guidance on Documentation Needed to Substantiate Animal Raising Claims for Label Submission do not fully recognize the suite of requirements and attributes of organic production. We encourage FSIS to consult with USDA-AMS’s National Organic Program on what additional production practices and attributes not mentioned above are already verified through the organic certification process, so organic producers are not saddled with duplicative documentation requirements when they choose to describe those specific organic practices and attributes on their product labels.

On behalf of our members across the supply chain and the country, OTA thanks the Food Safety and Inspection Service for the opportunity to comment.

Respectfully submitted,

Nathaniel Lewis
Farm Policy Director
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association