

## **USDA GRASS FED PROGRAM FOR SMALL AND VERY SMALL PRODUCERS FAQ:**

**Can I feed molasses to my animals during the months of December and January in Northern Wisconsin, due to adverse cold conditions?**

No, you can't feed molasses on a continual basis (whether it is liquid, block form, or protein blocks) and maintain the USDA Grass Fed certification. The Grass Fed Standard allows for the inadvertent uses of molasses or grains and also for "occasional use for extreme conditions such as weather", but the continued use of feeding for 2 months is not inadvertent or occasional use, as the animals are getting the energy from the molasses on a continual basis.

**I am curious whether imported beef is able to apply for and use the USDA grass fed label standard.**

The USDA Grass Fed for Small and Very Small (SVS) Producers Program is designed for U.S. producers. There are other programs for imported product if a producer in other countries wants to export USDA Certified Grass Fed.

**It is all about economics. Will the consumer pay twice the amount for grass fed beef? A recent study showed that it costs 17% more to finish grass fed beef vs. grain fed. Of course grass fed beef can receive grain thus this cost might be reduced. The producer must receive 2 times per pound more for his efforts. Argentina can produce very good grass fed and grain fed beef for a lot less than we can in USA and Canada. Can we compete with Argentina?**

To be clear, you cannot feed grain to a USDA Grass Fed animal and still have a conforming animal. Regardless, these are always business decisions as to whether or not a producer wants to apply for and receive certification. As far as competing with Argentina on this program, again this program was designed to help the small U.S. producers market their own cattle or sheep.

**How does a system like this fit in to an area like Southeast Minnesota with high land costs and a short season? It doesn't seem to pencil out.**

It is a business decision. It is designed to help the small producers market their livestock with a marketing claim. Not everyone will decide to do it, but the 2011 census shows there are 600,000 plus operations that fit into this SVS program for cattle and 20,000 plus operations for sheep. It is for the small producers to be able to market qualifying animals with a marketing claim.

**Does this impact the National School Lunch Program (NSLP)? Will USDA be looking to buy this as USDA Foods such as 100154 Coarse Beef or 100155 Fresh?**

USDA purchases commodities for the National School Lunch Program and other federal food nutrition assistance programs to support American agricultural markets. As such, we attempt to get the best value for the programs we support. We are aware of the recent trends in the cattle industry and demand from consumers regarding grass fed beef. However, currently there is not enough grass fed beef (at prices commensurate with traditional beef) to warrant a purchase at the federal level to meet the demands of the National School Lunch program and other federal food and nutrition programs.

**Are the cows included in the 49 head count?**

The program is designed for the calves/yearlings to market the younger beef animals. We are allowing the cows in if, for example, someone wants to market Grass Fed Ground beef. It's the calves from 49 cows, but we will say that if you want to market all 49 of your cows, we consider that okay.

**If I am already a USDA National Organic Program (NOP) certified organic producer, who has always made the grass fed claim (and meets the SVS requirements), do I have to have an SVS approval also?**

No, if you are approved by one of the USDA Guide 65 Accredited Certifying Agents (ACA) who have the authority to do the USDA Grass Fed Marketing claim and have received the USDA Grass Fed Certification from such ACA, you are already approved for Grass Fed regardless of size of operation and you can market your live animals as meeting the USDA Grass Fed Claim.

**Could you please clarify the differences in the statements USDA Certified Grass Fed, USDA Grass Fed and Grass Fed as to what documentation or certification is required to use the claim on a label?**

To use the Grass Fed label, you can present your certificate to a USDA slaughter facility and you can get the meat products from those animals labeled as Grass Fed. If you want to use the label USDA Certified Grass Fed or USDA Grass Fed (which involves the USDA name, or the USDA backing that claim) then that facility must have a QSA program with us to where we audit that facility, then FSIS will allow labels to be used such as USDA Grass Fed or USDA Certified Grass Fed on those products.

**Will the processors have support in understanding this program in an effort to work with their producing clients and market-ready meat?**

Yes, we will provide support and already work with many of the processors in the U.S. and many of them have programs with us. We also work closely with FSIS who controls the labeling in the Federal establishments.

**If we see a label with a claim that is covered by the USDA standard, what (if any) is our responsibility to report the claim to USDA?**

If a consumer or producer observes a "USDA Grass Fed" or "USDA Certified Grass Fed" label at retail, then you always have the right to report the label to AMS. You are not required to report any label to AMS. If you believe the label could be in error or even fraudulent, then we request that you contact us to report the observation so that we may conduct a review of the label at the retail establishment to determine accuracy and make corrections, as necessary.

**Can I feed silage?**

Yes, in certain circumstances. Anything coming from forages or grasses (such as hay silage) is allowed. Corn silages, grain silages, or any silage made from the grain-state are not allowed.

**It is my understanding that the farmer is responsible for reviewing their own minerals for compliance. Is this correct? Does the technical reviewer verify that the products listed do not contain urea/other prohibited ingredients?**

This is correct. The farmer/rancher needs to verify his minerals/vitamins package contents based on the packaging or bag tag. If there are any questions about it, then indicate this on the farm plan. Many minerals and vitamins packages also contain binder products including grain byproducts or molasses. If so, we need to know about this as it is stated on the bag tag. Any vitamins/minerals need to be indicated on the farm plan and the reviewer will review the label/bag tag on a case by case basis for compliance.

**Does this program have oversight processes besides the application and interview?**

We reserve the right to come on site whenever necessary, but in general there are no onsite audits. We have found however that by listing operations on our website, there becomes a monitoring of producers by other producers and any inconsistencies are reported to AMS. The \$108 fee covers the costs of certification, and certifies those animals for a 2-year period.

**Does it matter that the cattle are raised on different tracts of land under control of the producer?**

No, as long as you identify what those are (for example, 50 acres at your farm, 10 acres at a neighbor's farm that you have leased, etc.). This must be identified on the application, and the land and animals must be under your control (no one else is feeding them or attempting to feed them).

**I have a very small dairy that I keep grass fed. Can I just sell my bull calves as grass fed even though it is a dairy?**

Yes. When we refer to cattle, we are including beef and dairy. If you have a dairy operation with 49 or less calves, and you want to sell your bull calves as grass fed, then you would be eligible to do so.

**Are producers required to have a 'certified' farm plan? How is this determined?**

A farm plan does not have to be certified. This information should be provided in your application, and when we call to discuss your plan, we will go over the details with you. You will describe how you (the producer) operate your farm. If you are certified for other programs that are out there (Organic, etc.) then we can use that farm plan, but may have to ask some supplementary questions in order to use the farm plan.

**Can the claim 100% grass fed be made? If so, can there be a claim of something less than 100%?**

The claim of 100% Grass Fed could be made with USDA FSIS approval. If it is going to be USDA Grass Fed, it must go through one of our QSA programs. FSIS will allow several labels, such as 'Grass Fed' without using one of our programs, but you cannot say "USDA Certified Grass Fed" unless we are involved in the slaughter and processing facilities.

**Can producer groups be sent in under one application?**

No, Each person has to send in a separate application for his/her farm or business (each one is an individual program).

**Is certified organic a QSA program?**

No, certified organic is through the National Organic Program (NOP) but it is not a QSA program.

**Is there a land-to-animals ratio required to ensure we do not end up with confinement operations feeding grass?**

No, there is no specific ratio requirement; however, this information must be indicated on the application, and signed with the affidavit, which must show that there is enough land (grass) to feed the number of animals you have listed.

**These guidelines are for animals harvested for meat. Is there a similar program for milk producing livestock?**

We have had inquiries on this and currently we are considering this as a possible program.

**If outside source cattle/sheep are purchased, how long before they could be included in the program?**

If you are talking about the cows/ewes, and they are not purchased from another USDA Certified Grass Fed program, then the cows/ewes would never become certified. Their offspring would be able to be certified if you have the Grass Fed operation in place. If you are buying calves or lambs from another producer that is USDA Certified Grass Fed, then that certification carries with the animals if you are also Certified Grass Fed. If you are buying from a sale barn or off a video, then there is no way we can verify that those animals were grass fed, unless that producer is (and those animals) are enrolled in the program. If you plan to purchase animals in that manner, you would need to ensure that you

are purchasing from a producer that is Certified Grass Fed in order to comply with the Grass Fed Program.

**How does this USDA claim differ from USDA "natural" or USDA "naturally raised" claims?**

The USDA Grass Fed SVS program pertains to marketing claims on how the animals are fed for their lifetime; some other programs also include whether antibiotics, hormones or growth promotants are used, etc. This program is based solely on how the animals are fed, not on how they are treated or other factors.

**What specifically constitutes "Grass"? Does this include any perennial forage, like legumes?**

Yes, and the standard itself explains what the term "grass" includes. The standard reads: Grass and forage shall be the feed source consumed for the lifetime of the ruminant animal, with the exception of milk consumed prior to weaning. The diet shall be derived solely from forage consisting of grass (annual and perennial), forbs (e.g., legumes, Brassica), browse, or cereal grain crops in the vegetative (pre-grain) state. Animals cannot be fed grain or grain byproducts and must have continuous access to pasture during the growing season. Hay, haylage, baleage, silage, crop residue without grain, and other roughage sources may also be included as acceptable feed sources.

**Can stock from other farms that was not certified grass fed ever be certified as such? For instance, if we follow all guidelines for three years, then can they be certified as Grass Fed?**

No, this program applies for the life of the animals, so you must verify that the animals are grass fed for life in order to use the USDA Grass Fed claim.

**How do I locate the nearest USDA certified grass fed harvest/processing facility, or is it possible to get a directory of them?**

Yes, we can look into putting together a directory to post on our website.

**When will we have access to the August 5<sup>th</sup> USDA Grass Fed SVS Program webinar offline? Will a PDF of the presentation also be made available after the webinar?**

A recording of the webinar as well as the webinar slide presentation has been posted to our Grass Fed SVS webpage at: <http://www.ams.usda.gov/AMSv1.0/GrassFedSVS>.

**So even if we get USDA certified grass-fed, but only have a state inspected facility, then we CAN NOT use the USDA grass-fed label?**

AMS has done further research and Yes, it is possible to get the USDA Grass Fed Label on meat product at the State inspected facility. The State inspected facility must be under a Federal/State Cooperative Agreement and the facility must follow all the rules and regulations set forth by USDA FSIS for label application, review and approval. The facility however, will still have to participate with the AMS LPS Quality Assessment Division and have an approved Quality System Assessment program in place to allow the labeling of the meat products as USDA Grass Fed variations of the USDA name. Once this is done, that will allow the State inspected facilities to harvest the grass fed animals and label the product as USDA Grass Fed.