



Experiences in Applying for a Grass Fed Label

Dr. Cindy Daley & Trevor Nunes
College of Agriculture
CSU, Chico



The Application:

- **USDA/FSIS Label Submission
Form 7234-1**



According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0583-0002. The time required to complete this information collection is estimated to average 15 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This form has been approved by OMB for web distribution.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE APPLICATION FOR APPROVAL OF LABELS, MARKING OR DEVICE FSIS has determined that information provided in items 8, 9, and 10 is exempt from mandatory disclosure under the Freedom of Information Act 5 U.S.C. 552(b)(4). APPLICANT: See Page 2 for instructions.	1. AGENT NAME, ADDRESS, TELEPHONE NO. (If using an Agent, complete this block, otherwise leave blank.) CSU, Chico Meats Lab University Farm 311 Nicholas C. Schouten Ln Chico, CA 95928 (530) 898-6280	2. FOR USDA USE ONLY	3. FOR USDA USE ONLY	4. ESTABLISHMENT NO. / FOREIGN COUNTRY (If applicable) 9004
	5a. NAME OF PRODUCT Grass Fed Ground Beef			5b. HACCP PROCESS CATEGORY Raw / Ground
6a. TYPE OF APPROVAL REQUESTED <input checked="" type="checkbox"/> SKETCH <input type="checkbox"/> TEMPORARY <input type="checkbox"/> EXTENSION OF TEMPORARY		6b. WAS THE LABEL PREVIOUSLY APPROVED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Date of approval: _____ Prior approval number: _____ Number of labels on hand: _____ Number of days requested: _____		7a. AREA OF PRINCIPAL DISPLAY PANEL (Square inches): 4.2 Square Inches
7b. TOTAL AVAILABLE LABELING SPACE FOR ENTIRE PACKAGE (Square inches): 8" X 11" = 80 Square Inches		8. PRODUCT FORMULA Beef trim - no added ingredients		
9. PROCESSING PROCEDURES (Approval of the sketch does not convey approval of the processing procedures)		10. NAME AND ADDRESS OF FIRM (Below and between dots) • CSU, Chico Meats Lab • University Farm • 311 Nicholas C. Schouten Ln • Chico, CA 92928 •		
11. SIGNATURE OF APPLICANT OR AGENT <i>David Kline</i>		12. CONDITIONS APPLYING TO USE OF LABELS OR DEVICE (FOR USDA USE ONLY)		
10. NAME AND ADDRESS OF FIRM (Below and between dots) • CSU, Chico Meats Lab • University Farm • 311 Nicholas C. Schouten Ln • Chico, CA 92928 •		DATE 08/07/2006		

FSIS FORM 7234-1 (10/03/2002) REPLACES FSIS FORM 7234-1 (11/87), WHICH IS OBSOLETE.

Label Sketch: 8 Required Features

- Product Name
- USDA Inspection Legend
- Net Weight
- Handling Statement
- Address (Signature) Line
- Ingredients Statement
- Nutrition Facts
- Safe Handling Instructions



CSU, Chico's Approved Labels:

- CSU, Chico Grass-Fed Ground Beef
 - with Omega-3 nutritional claim
- Grass-Fed Ground Beef
 - With Omega-3 nutritional claim
- All-Natural Beef



UNIVERSITY FARM PRODUCTS
ALL NATURAL GRASS FED BEEF
0.07g of Omega 3 / serving

SAFE HANDLING INSTRUCTIONS
THIS PRODUCT WAS PREPARED FROM INSPECTED AND PASSED MEAT AND/OR POULTRY. SOME FOOD PRODUCTS MAY CONTAIN MATERIAL THAT COULD CAUSE ILLNESS IF THE PRODUCT IS MISHANDLED OR COOKED IMPROPERLY. FOR YOUR PROTECTION, FOLLOW THESE SAFE HANDLING INSTRUCTIONS.

KEEP REFRIGERATED OR FROZEN.
 THAW IN REFRIGERATOR OR MICROWAVE.
 KEEP RAW MEAT AND POULTRY SEPARATE FROM OTHER FOODS, WASH WORKING SURFACES (INCLUDING CUTTING BOARDS, UTENSILS, AND HANDS AFTER TOUCHING RAW MEAT OR POULTRY).

COOK THOROUGHLY.
 KEEP HOT FOODS HOT. REFRIGERATE LEFTOVERS IMMEDIATELY OR DISCARD.

SELL BY: 01/15/07

NET WT	UNIT PRICE	**TOTAL PRICE**
0.00 lb	\$0.00/lb	\$0.00

U.S. INSPECTED AND PASSED BY DEPARTMENT OF AGRICULTURE EST. 9004

KEEP REFRIGERATED OR FROZEN.



GRASS FED BEEF

ALL NATURAL

0.07g of Omega 3 / serving

SAFE HANDLING INSTRUCTIONS
THIS PRODUCT WAS PREPARED FROM INSPECTED AND PASSED MEAT AND/OR POULTRY. SOME FOOD PRODUCTS MAY CONTAIN MATERIAL THAT COULD CAUSE ILLNESS IF THE PRODUCT IS MISHANDLED OR COOKED IMPROPERLY FOR YOUR PROTECTION. FOLLOW THESE SAFE HANDLING INSTRUCTIONS.

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SELL BY: 01/15/07

NET WT	UNIT PRICE	**TOTAL PRICE**
0.00 lb	\$0.00/lb	\$0.00

U.S. INSPECTED AND PASSED BY DEPARTMENT OF AGRICULTURE EST. 9004

KEEP REFRIGERATED OR FROZEN.

CHICO
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ALL NATURAL

BEEF

SAFE HANDLING INSTRUCTIONS
THIS PRODUCT WAS PREPARED FROM INSPECTED AND PASSED MEAT AND/OR POULTRY. SOME FOOD PRODUCTS MAY CONTAIN MATERIAL THAT COULD CAUSE ILLNESS IF THE PRODUCT IS MISHANDLED OR COOKED IMPROPERLY FOR YOUR PROTECTION. FOLLOW THESE SAFE HANDLING INSTRUCTIONS.

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SELL BY: 01/15/07

NET WT	UNIT PRICE	**TOTAL PRICE**
0.00 lb	\$0.00/lb	\$0.00

U.S. INSPECTED AND PASSED BY DEPARTMENT OF AGRICULTURE EST. 9004

KEEP REFRIGERATED OR FROZEN.


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Supply Documentation for Label Claims:

- Production claim:
 - i.e. husbandry practices for grass-fed beef
- Nutritional claim:
 - i.e. Siliker Lab nutritional analysis
 - Submitted: 1" Rib Steak taken between 12th & 13th rib
 - Full nutrient analysis + Omega 3



Modesto 209-521-1005 Page 4 of 4



SILLIKER, Inc.
Northern California Laboratory
1548 Cummins Drive
Modesto, CA 95358-6412
209/ 521 5503 Fax 209/ 521 1005

CERTIFICATE OF ANALYSIS

COA No:	CCA-31133010-0
Supersedes:	None
COA Date	4/7/06
Page 1 of 1	

TO:
Mr. Jim W. Holt
Lab Tech
CSUC Ag Teaching & Rsrch Cntr Meats L
311 N.C. Schouten Lane
Chico, CA 95928

Received From:	Chico, CA
Received Date:	3/18/06
Location of Test: (except where noted) Modesto, CA	

Analytical Results

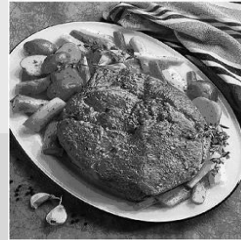
Desc. 1:	Grass Fed Beef Rib Steak	Laboratory ID:	306194620
Desc. 2:	No Added Ingredients	Condition Rec'd:	NORMAL
Desc. 3:	Codes: 17R, 13R, 15R, 2R, 7R	Temp Rec'd (°C):	3
Analyte	Result Units	Method Reference	Test Date Loc.
Omega 3 Fatty Acids	0.08 g/100g	Calculation	4/7/06 CHG


Stephanie Campbell
Stephanie Campbell, M.S. Laboratory Director

Noted Test Locations: CHG-Silliker, Inc. Illinois Laboratory, 1304 Halsted Street, Chicago Heights, IL 60411

Supplemental Label Requirements for a Nutritional Claim:

- Nutrition facts panel:
 - Required as background for any nutrient content claim
 - CSU, Chico's approach:
 - Include on separate label





SILLIKER, Inc.
Northern California Laboratory
1548 Cummins Drive
Modesto, CA 95358-6412
209/ 521 5503 Fax 209/ 521 1005

CERTIFICATE OF ANALYSIS

COA No:	CCA-3115667-0
Supersedes:	None
COA Date:	7/7/06
Page 1 of 3	

TO:
Mr. Jim W. Holt
Lab Tech
CSUC Ag Teaching & Rsrch Cntr Meats L.
311 N.C. Schoulen Lane
Chico, CA 95928

Received From: Chico, CA
Received Date: 3/18/06
Location of Test (except where noted):
Modesto, CA

Analytical Results

Desc. 1: Grass Fed Beef Rib Steak Laboratory ID: 306194565
 Desc. 2: No Added Ingredients Condition Rec'd: NORMAL
 Desc. 3: Codes: 17R, 13R, 15R, 2R, 7R Temp Rec'd (°C): 3

Analyte: Nutrition - Meat & Poultry Package Test Date: 4/25/2006
 Loc.: CHG

NUTRITIONAL ANALYSIS
Serving Size: 85 g
Household Measure: 3 ounces

LABEL ANALYTES	ANALYTICAL DATA PER 100g	ANALYTICAL DATA PER SERVING	ROUNDED DATA PER SERVING	% DAILY VALUE
Calories	193.9	164.9	160	
Calories from Fat	105.8	90.0	90	
Total Fat (g)	11.76	10.00	10	15
Saturated Fat (g)	4.22	3.59	3.5	18
Trans Fat (g)	0.48	0.41	0	
Cholesterol (mg)	62.2	62.0	55	18
Sodium (mg)	56.6	48.1	50	2
Total Carbohydrate (g)	0.3	0.3	0	0
Dietary Fiber (g)	N/A	N/A	N/A	
Sugars (g)	N/A	N/A	N/A	
Protein (F=6.25) (g)	21.72	18.47	18	
Vitamin A (IU)	N/A	N/A	N/A	
Vitamin C (mg)	N/A	N/A	N/A	
Calcium (mg)	26.7	22.7		2
Iron (mg)	1.7	1.4		8
CONTRIBUTING ANALYTES				
Moisture (g)	64.79	55.10		
Ash (g)	1.39	1.16		
Beta Carotene (IU)	N/A	N/A		
Retinol (IU)	N/A	N/A		

* Contain less than 2% of the Daily Value of this nutrient.
 N/A Not analyzed, as product is generally not considered a source of this nutrient.

The results of these tests relate only to the samples tested. This report shall not be reproduced except in full, without the written approval of the laboratory.

***Review formatting options online.**

Nutrition Facts	
Serv Size 3oz (85g)	
Amount Per Serving	
Calories 160	Calories from Fat 90
% Daily Value*	
Total Fat 14g	15%
Sat Fat 3.5g	18%
Cholesterol 55mg	18%
Sodium 50mg	2%
Total Carb 0g	0%
Protein 18g	
Calcium 2%	Iron 8%

Not a significant source of dietary fiber, sugars, vitamin A, and vitamin C.

* Percent Daily Values are based on a 2,000 calorie diet

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Common Mistakes on Label Submissions:

- **Multi-ingredient components not sub-listed**
- **% restricted ingredients not provided / supported**
- **Binders in the pumped-in solution not included**
- **Order of predominance of ingredients is wrong**
- **Geographic claims / styles unsupported by data**
- **Nutrition claims unsupported by data / regulations don't permit**
- **Not enough copies of submission forms**
- **Submission is not legible (any part)**
- **Lack of compelling reason for temporary label approval**
- **Product name prominence/letter size conflict with requirements**
- **Meaningful terms/claims are not validated on the application**

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Helpful Hints:

- Submit supplemental application materials in triplicate
 - Excluding application form (1 per label)
- Use as few staples as possible
 - No paper clips
- Order application materials:
 - Form 7234-1, label sketch, remainder of materials in any order



Helpful Resources:

- <http://www.csuchico.edu/agr/grassfedbeef/label/process.html>
- **USDA, FSIS, OPED**
Labeling and Consumer Protection Staff
(202) 205-0623 or (202) 205-0279. http://www.fsis.usda.gov/Regulations_&_Policies/Label_Submission_Checklist/index.asp
- http://www.primelabel.com/Getting_Started.html



HACCP Process Categories

- (i) Slaughter--all species.**
- (ii) Raw product--ground.**
- (iii) Raw product--not ground.**
- (iv) Thermally processed--commercially sterile.**
- (v) Not heat treated--shelf stable.**
- (vi) Heat treated--shelf stable.**
- (vii) Fully cooked--not shelf stable.**
- (viii) Heat treated but not fully cooked--not shelf stable.**
- (ix) Product with secondary inhibitors--not shelf stable.**

