grass run farms™
100% Grass Fed Beef

How to Use These Nutrition Panels

A Guide to USDA Label Requirements & Approvals

Through a grant provided by the Sustainable Agriculture Research and Education (SARE) Program, Grass Run Farms conducted nutritional analysis of 10 popular cuts of beef in collaboration with Iowa State University Department of Animal Science. The nutritional value of each cut was then compared to that of conventional grain-fed beef, using USDA data contained in the National Nutrient Database for Standard Reference.

Cuts tested include: ribeye steak, strip loin steak (New York strip), top sirloin steak, chuck roast, inside round roast, and sirloin roast. In addition, analyses were completed for lean points of ground beef.

Unlike early academic studies of grass-fed beef, this analysis represents marbled, 'finished' grass-fed beef known in the marketplace for its consistency and eating quality -- in other words, a palatable comparison to the 'grain-fed' eating experience widely expected in North America.

Part of the intent of the grant is to share the results with other grass-fed beef producers/marketers looking to label their products in the U.S. retail marketplace. This guide will explain the components of a USDA nutrition label and guide the user to the adaptation of this SARE grant's data.

Step 1: Obtaining Required Data

To have a meat label approved by the USDA, it must include a full nutrition panel or a URL link to the full nutrition information, if the label is too small to hold all the info due to the unit/label size.

NOTE: You do not need to submit a separate application for approval of each item. You may submit one sketch showing the dimension and placement of required label components and include a list of the items to which the design will be applied, such as "Beef Ribeye Steak," "Beef New York Strip Steak," etc…. as long as you demonstrate how the label will change for each item: Product ID (name), Nutrition Panel, UPC (if included), etc…. One application for approval may thus be several pages long, with subsequent pages detailing variations on the main label design.

In most cases, you will have a graphic designer mock up the sketch template, and you will need to provide him/her with the raw data to be laid out in the Nutrition Panel for each item.

To get started, download the data you need. Grass Run Farms grass-fed beef data may be shared directly:

Fact Sheet: Top Sirloin Steak

Fact Sheet: Ribeye Steak

Fact Sheet: Strip Loin (NY Strip) Steak

Fact Sheet: Chuck Roast

Fact Sheet: Top Round Roast

Fact Sheet: Sirloin/Round Tip (Peeled Knuckle) Roast

Fact Sheet: 75% Lean/25% Fat Ground Beef

Fact Sheet: 80% Lean/20% Fat Ground Beef

Fact Sheet: 85% Lean/15% Fat Ground Beef

Fact Sheet: 92% Lean/8% Fat Ground Beef

If you need beef cuts that do not appear in Grass Run Farms Fact Sheets, you may download them from the National Nutrient Database for Standard Reference. Be sure to select only data for the 'raw' product, not 'cooked' and choose the grade of animal that most closely resembles your typical harvest ('choice,' 'select' or 'all grades').

Step 2: Formatting the Data

USDA -approved labels have a strict format for the information contained in a Nutrition Panel. If a graphic designer is formatting your information, he/she will likely lay it out manually with design software.

You may also generate a .PDF or .PNG file yourself using an online interface such as OnlineLabels.com. This will result in an image that cannot be manipulated but can be recreated from the website, should you need to make changes.

In general, required statements for a meat portion the size of a burger, steak or roast are as follows.

Abbreviated guidelines are available here:
http://www.fsis.usda.gov/wps/wcm/connect/f4af7c74-2b9f-4484-bb16-fd8f9820012d/Labeling_Requirements_Guide.pdf?MOD=AJPERES

Specific guidelines are in the Federal Register, including the point sizes for fonts (beginning page 197):
http://www.gpo.gov/fdsys/pkg/CFR-2011-title9-vol2/pdf/CFR-2011-title9-vol2-sec317-309.pdf

This is the 'full format' grid:

Nutrition Facts

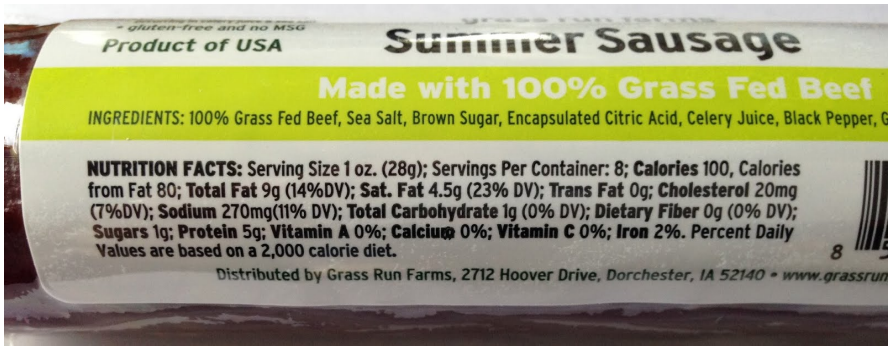
Serving Size 4 oz (112g)
Servings Per Container: 4

Amount Per Serving	
Calories 220	Calories from Fat 130
	% Daily Value*
Total Fat 14g	**22%**
Saturated Fat 6g	**30%**
Cholesterol 70mg	**23%**
Sodium 75mg	**3%**
Total Carbohydrate 0g	**0%**
Protein 22g	**44%**
Iron 10%	

Not a significant source of dietary fiber, sugars, vitamin A, vitamin C, and calcium. * Percent Daily Values are based on a 2,000 calorie diet.

Items in packages with 40 square inches or less of available surface area may use a tabular label format, as below.

You might also take suggestions for small design tweaks and information placement from competing products in the marketplace. It's OK to use a competitor's example, but ***please note that USDA approval is an extremely capricious process subject to human discretion***. Just because a competitor had a claim, design or data approved does NOT mean it will be approved for your item(s)!



How Required Information Should Read	Explanation/Notes
"Serving Size 4 oz (112g)"	This size declaration is required for packages weighing 4 oz or more, regardless of whether the package contains pre-made units of a different weight, such as '⅓-lb patties'
"Servings Per Container: Varied" or "Servings Per Container: [Even multiple of 4 oz]"	Use "Varied" if the amount in the package is not evenly divisible by the Serving Size of 4 oz or is not precisely labeled per package, as with catch-weight roasts. Use an exact number if the stated package size is an even multiple of 4 oz.
"Calories [xx]" and "Calories from fat [xx]"	Required under the heading "Amount Per Serving"
"Total Fat [xx]g" and "[xx]%"	Required under the heading "% Daily Value*"
"Saturated Fat [xx]g" and "[xx]%"	Required -- indented under the Total Fat
"Trans Fat [xx]g" and "[xx]%"	While technically a voluntary declaration, most labels now include it, and it is recommended for mandatory inclusion in the next round of revision to requirements. Indented under the Total Fat
"Cholesterol [xx]mg" and "[xx]%"	Required
"Sodium [xx]mg" and "[xx]%"	Required
"Total Carbohydrate [xx]g" and "[xx]%" "Dietary Fiber [xx]g" and "[xx]%" "Sugars [xx]g"	Most raw single-ingredient meat products do not contain measurable carbohydrates, so it is the most efficient use of space to condense the 'Total Carbohydrate,' 'Dietary Fiber' and 'Sugars' declaration to one line and add the balance to the source disclaimer at the bottom of the panel.
"Protein [xx]g"	Protein is required to be represented by weight (grams), but representation by percentage is optional. As a rule, Grass Run Farms includes the percentage as a service to the customer.
"Iron [xx]%"	The only required vitamins and minerals are Iron, Vitamin A, Vitamin C, and Calcium. Many labels also list Potassium in between "Cholesterol" and "Sodium" in the middle section of the panel, but it is not required.
"Not a significant source of…"	Known as the 'disclaimer statement' this sentence must be included if any of the required elements above have been omitted for lack of quantifiable value. Any required nutritional value, vitamin or mineral that is represented by 2% or less in the panel can be listed either as a value or in the source disclaimer. They must appear in one place or the other *but not both*. In other words, if you list an item with a value in the upper portion of the panel, you should NOT list it in the source disclaimer at the bottom.
"% Daily Values are based on a 2,000 calorie diet."	This statement is required to qualify the percentages listed in the panel. May be abbreviated "DV" to conserve space on the label, according to guidelines: http://www.fsis.usda.gov/wps/wcm/connect/f4af7c74-2b9f-4484-bb16-fd8f9820012d/Labeling_Requirements_Guide.pdf?MOD=AJPERES

Step 3: Submitting a Label for Approval

The guidelines linked in Step 2 cover the requirements for the whole label's design, not just the Nutrition Facts detailed here. Once the design specs have been met, there are two ways to submit a label to USDA:

- Option A: Apply for an online account with LSAS (Label Submission and Approval System): http://www.fsis.usda.gov/wps/portal/fsis/topics/regulatory-compliance/labeling/labeling-procedures/label-submission-and-approval-system

This allows you to upload your full application, including Form 7234-1, label sketch and supporting documents. It allows you to log in and check which applications USDA is currently reviewing by date (which allows you to calculate how long it will take them to get to your application). The system also keeps digital record of your applications, so you don't have to refer to physical files in the future.

The only drawbacks we've found with this method is that if USDA marks any required changes to your design, they are often very hard to 'see' because they're digitally type-written in the margins of your design sketch, as opposed to hand-written in much more clarity if you submit your application manually through a label expeditor (Option B here). It's also difficult to contact USDA by this system if you have questions about why they marked particular changes.

- Option B: Have a label expeditor compile and submit your application for you.
  We use a private individual for this if we're submitting a complicated or cutting-edge label that might need professional review even before submission to the USDA. Professional expeditors often work in physical proximity to the USDA offices, allowing them to track your application in person if needed and explain changes that are marked, if any.

  NOTE: Expediters usually charge flat fees per application. Some leading expeditors charge $400 or more per application submitted. Private individuals might charge $50 or less. If you use the services of a more costly expeditor, be sure to ask questions about how to bundle as many products/items into one application as possible and get the most professional consultation for your money, leading up to submitting the application itself. It's OK to pay for advice sometimes if it will save you money in the future.

Step 4: Making Changes to an Approved Label

The USDA recognizes that product manufacturing is dynamic and that labels may need to change over time. For this reason, there's an identified list of elements that can be modified on a label without submitting it for re-approval. The process is called 'generic approval' and is conducted at the processing plant level -- the staff quality assurance officer will fill out and submit a simplified form documenting the change.

In general, you may REMOVE claims and other voluntary elements from an approved label without reapplication.
You may make "changes in nutrition labeling that only involve quantitative adjustments to the nutrition labeling information, except for serving sizes, provided the nutrition labeling information maintains its accuracy and consistency."

For more explanation, see:
http://www.fsis.usda.gov/OPPDE/larc/Procedures/generic.pdf
http://www.fsis.usda.gov/wps/wcm/connect/233653d0-62e1-4cc0-b23e-28d070f883af/Generic-Final-Rule-Overview-Industry.pdf?MOD=AJPERES

For More Information

Visit our website: grassrunfarms.com/nutrition and our blog, Against the Grain for further discussion of nutritional analysis and its service to consumers. See the contents of our SARE grant project at SARE Project FNC13-912.

Further information about USDA meat label requirements appears in the Labeling Policy Book:
http://www.fsis.usda.gov/wps/wcm/connect/7c48be3e-e516-4ccf-a2d5-b95a128f04ae/Labeling_Policy_Book_082005.pdf?MOD=AJPERES

Labeling requirements do change over time, and it's hard to tell what's really required for compliance because long-standing labels are often 'grandfathered in' using their original designs, and companies are allowed to exhaust 'existing label inventory' before reprinting to make any mandatory changes.

The USDA's own website for the explanation of requirements is not typically easy to navigate; we find it easiest to conduct Google searches for topics related to label design, then reverse-engineer our way to the source, usually the Federal Register, by searching for more and more specific terms.

As of February 2014, USDA is proposing changes to the Nutrition Facts panel intended to help the consumer better understand the information presented.

Changes include adjusting the Serving Size to the quantity most typically consumed in a sitting and making the Calorie content for that adjusted size much more obvious.

The proposed changes are open to public comment through August 1, 2014.

For more information, visit:
http://www.fda.gov/food/guidanceregulation/guidancedocumentsregulatoryinformation/labelingnutrition/ucm385663.htm