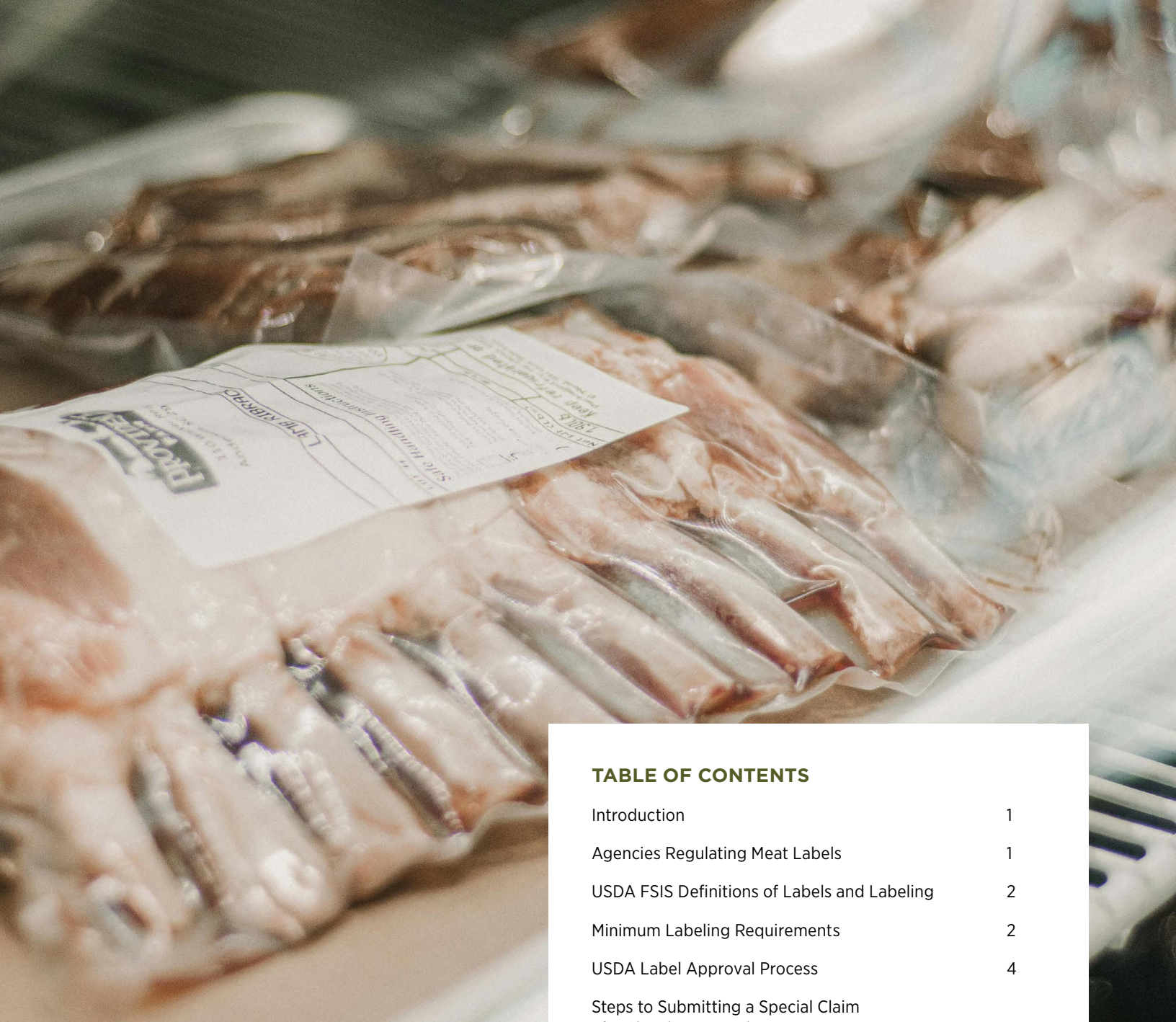




Labeling Meat from Livestock and Poultry: Guidance for Direct Farm Marketers

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Acknowledgments

This publication updates information provided through UT Extension publication PB1861 Meat Product Labeling Guidance for Direct Farm Marketers, released in December 2017. PB1861 was authored by Chuck Grigsby, former Extension specialist, and Megan Bruch Leffew, Extension specialist, for the Center for Profitable Agriculture.

TABLE OF CONTENTS

Introduction	1
Agencies Regulating Meat Labels	1
USDA FSIS Definitions of Labels and Labeling	2
Minimum Labeling Requirements	2
USDA Label Approval Process	4
Steps to Submitting a Special Claim for Sketch Approval	5
Summary	7
Online Resources	8
References	8
Appendices	8



INTRODUCTION

Producers interested in marketing meat from livestock and poultry face several regulatory hurdles including product label requirements, opportunities and limitations. Federal and state rules and regulations require a minimum set of components that producers must include on the label of a meat product. In addition to these minimum requirements, some producers want to highlight special characteristics of their products on the label or in promotional materials in order to differentiate their products from the competition. Some customers may be willing to pay more for products with certain characteristics, and producers may communicate those qualities to customers through the meat product label and accompanying marketing materials. For example, a producer may want to feature production claims such as grass fed, grain fed, no added hormones, or pasture raised or geographic claims such as locally grown or Tennessee product. Producers must follow additional rules and regulations when incorporating these special claims onto the label or in other marketing materials.

Note that regulations differ for meat from amenable and non-amenable species. This publication solely discusses regulations for amenable livestock and poultry. Amenable livestock products include those derived from cattle, sheep, goats, swine, horses, mules and other equines. Amenable poultry products include those derived from domesticated chickens, turkeys, ducks, geese and guineas. To simplify terminology for the purposes of this document, the term “meat” will be used in reference to amenable livestock and poultry products covered in the Federal Meat Inspection Act (FMIA) and the Poultry Products Inspection Act (PPIA). Amenable products are inspected by United States Department of Agriculture (USDA) Food Safety and Inspection Service (FSIS) officials without a fee-for-service to the processor.

This publication provides information to help value-added meat producers understand federal and Tennessee-specific labeling regulations and navigate label approval processes. Topics discussed include agencies regulating meat labels, USDA FSIS definitions of labels and labeling, minimum labeling requirements at the federal and state levels, USDA FSIS label approval processes and the steps involved in requesting and receiving approval to use special statements and claims on meat product labels.

AGENCIES REGULATING MEAT LABELS

Meat product labels are regulated by the USDA and, when sold at retail in the Tennessee, the Tennessee Department of Agriculture (TDA). The USDA FSIS has regulatory authority over meat and poultry product labeling under the FMIA and PPIA for federally-inspected products. USDA's FSIS develops and enforces policy for meat product labeling and ensures that meat products are properly labeled before they are marketed. Their role includes the verification that all statements and claims on meat product labels are truthful and not misleading.

The TDA Consumer and Industry Services Division also has a role in regulating labels for meat sold directly to consumers at retail within the state. The TDA has requirements for labeling of prices per pound and total prices, as discussed in further detail later in the publication. The TDA staff also examine product labels as part of their inspections for retail meat sales and retail food store licensing.

Looking Ahead – Tennessee State Meat Inspection for Cattle, Swine, Sheep and Goats

In 2025, the 114th Tennessee General Assembly and Governor Bill Lee took additional steps to authorize the TDA to develop and implement a state meat inspection program through Senate Bill 1265/Public Chapter 463. The Tennessee Meat Inspection Act applies to meat and meat products for cattle, swine, sheep and goats. Meat processed under the state inspection program may only be sold within Tennessee, unless the USDA's Cooperative Interstate Shipment Program is implemented [13]. The state inspection program must include inspection and sanitation requirements that are at least equal to federal requirements [3]. Once instituted, labels for products inspected through the state program will need to be pre-approved according to the rules and processes that will be set forth by the TDA. According to the Niche Meat Processors Assistance Network, state inspection program label approvals processes vary by state [2].

USDA FSIS DEFINITIONS OF LABELS AND LABELING

USDA FSIS has regulatory authority over meat product labeling [4]. Understanding how the FSIS defines and distinguishes labels and labeling can help producers meet federal regulatory requirements when using special statements and claims.

Labels are applied to meat product packaging to provide consumers with product information. In Title 9 Code of Federal Regulations (C.F.R.) § 317.2 (a), the term “label” is defined as “a display of any printing, lithographing, embossing, stickers, seals, or other written, printed, or graphic matter upon the immediate container (not including package liners) of any product.”

The FSIS definition of “labeling” is broader than its definition of “label,” as it includes the general definition of a meat product label and encompasses the promotional material used at the point of sale. “Labeling” is defined in 9 C.F.R. § 301.2 as “all labels and other written, printed, or graphic matter: (1) Upon any article or any of its containers or wrappers, or (2) Accompanying such article.” Therefore, FSIS regulates the content of labels affixed to meat products and point-of-purchase materials that are used for meat products such as brochures, pamphlets, signs or other promotional devices [4].

The FSIS requires approval of all labels applied to meat products before their use in commerce. FSIS does not require preapproval of point-of-purchase materials even if these materials contain special statements and claims describing the farm’s production practices or product characteristics. Special statements and claims made on point-of-purchase promotional materials, which are considered labeling by the FSIS, should be consistent with the statements and claims made on meat product labels, however. Special statements and claims should not be used on point-of-purchase materials if they have not been approved by FSIS for use on meat product labels [5]. The FSIS has the authority to take corrective action against meat product labels and point-of-purchase promotional materials considered false or misleading.

MINIMUM LABELING REQUIREMENTS

Minimum label requirements are determined by USDA FSIS and TDA. According to FSIS regulations, meat labels must include a minimum of eight components, including the product name, handling statement, USDA mark of inspection and establishment number, net weight of the product, signature line, safe handling instructions and a list of ingredients for multi-ingredient products. Producers/sellers seeking a TDA retail meat sales permit must include their name and address on the label. This may be as part of USDA’s required signature line or as a separate listing. The TDA also requires the price per pound and total price of the product to be listed on the label for random-weight, non-frozen items sold directly to consumers at retail. These minimum label requirements are listed with some additional information in Table 1.

Labeling features one (1) through four (4) in Table 1 must be displayed on the principal display panel (PDP), which corresponds to the front, most visible portion of the meat package. Labeling features five (5) through eight (8) may be placed on the PDP or the information panel (IP). The IP can be located on the front, side or back of the meat product package [7].

Some additional information related to Nutrition Labeling and TDA Weights and Measures requirements may be helpful.

Nutrition Labeling

Nutrition label requirements depend on several factors including product type, nutrition or health claims, and whether the processing facility qualifies as a small business. In addition, some distributors or buyers, such as grocery store chains, may require products to have a nutrition label. Producers may also choose to include a nutrition label even if not required by law. This section provides a basic overview of when a nutrition facts panel may be required for direct farm marketers of meat from livestock and poultry. Additional details of requirements and exceptions as well as format specifications for nutrition facts panels may be found in 9 C.F.R. § 317 Subpart B and 9 C.F.R. § 381 Subpart Y.

All products making nutrition or health claims (e.g., lean, low fat, good source of...) must include a nutrition facts panel on the package. The nutrition label must be included regardless of whether the processing plant qualifies for the small business exemption.

Processors with fewer than 500 employees and who make less than 100,000 pounds a year of a specific recipe have some exemptions to putting the nutrition facts panel on the label. Processors not meeting the small business exemption must include nutrition facts panels on every package.

For single-ingredient, raw major cuts of beef, pork, lamb and poultry, producers using processors who qualify as small businesses can choose to display a poster or brochure at the point of sale instead of putting the nutrition facts panel on every package. Ground products produced under the small business exemption are not required to have a nutrition facts panel. Ground products produced in a small business may include a percent lean and fat statement on the label as long as it is accurate and no nutrition or health claims are made. Multi-ingredient products like sausage or brats made in small plants do not require a nutrition label, unless a nutrition or health claim is made.

TDA Weights and Measures Regulations

The TDA Consumer and Industry Services, Weights and Measures Section, regulates the proper labeling of the net weight, price per pound (or kilogram) and total price for meat products sold in at retail in Tennessee. TDA’s Weights and Measures requirements depend on whether the meat products are sold frozen or non-frozen and whether the products are random or standard weight. Random weight products are of variable net weight, such as chuck roasts packaged according to their exact weight (e.g., 3.45 pounds and 4.23 pounds). Standard weight products all have the same weight, such as 1-pound packages of ground lamb.

For random weight, non-frozen meat products, Tennessee Code Annotated § 47-26-917 specifies that the price per pound and total price are plainly and conspicuously included on the label. Due to the TDA’s “Waiver of Declaration of Unit Price on Frozen Random Weight Packages” released in 2015, random weight, frozen meat products can either clearly indicate the price per pound on the label or plainly and conspicuously display the price per pound on a sign, poster, board, shelf, etc., located in close proximity to where the meat products are sold. The total price for frozen meat products can either be included on the label or calculated at the point of sale [1].

Standard weight meat products, non-frozen or frozen, must include the net weight on the label. Standard weight items are not required to include the price per pound and total price on the label. However, the price of the product should be plainly and conspicuously displayed at the point of sale.

Table 1. USDA FSIS and TDA Minimum Label Requirements

USDA FSIS Requirements
1. Product name
2. Handling statement (e.g., “Keep Frozen,” “Keep Refrigerated,” or “Perishable – Keep Refrigerated or Frozen”)
3. Inspection legend and establishment number
4. Net weight for product sold at retail
5. Signature line (name or trade name and address of the manufacturer, packer or distributor)
6. Safe handling instructions
7. Nutrition labeling (if applicable as described in previous section)
8. Ingredients statement (Required for multiple ingredient meat products only. Ingredients must be listed in order of predominance by weight.)
9. Producer/seller name and address (required for TDA retail meat sales permit)
TDA Requirements
10. Price per pound (kilogram) (required for random weight, non-frozen products only)
11. Total price (required for random weight, non-frozen products only)

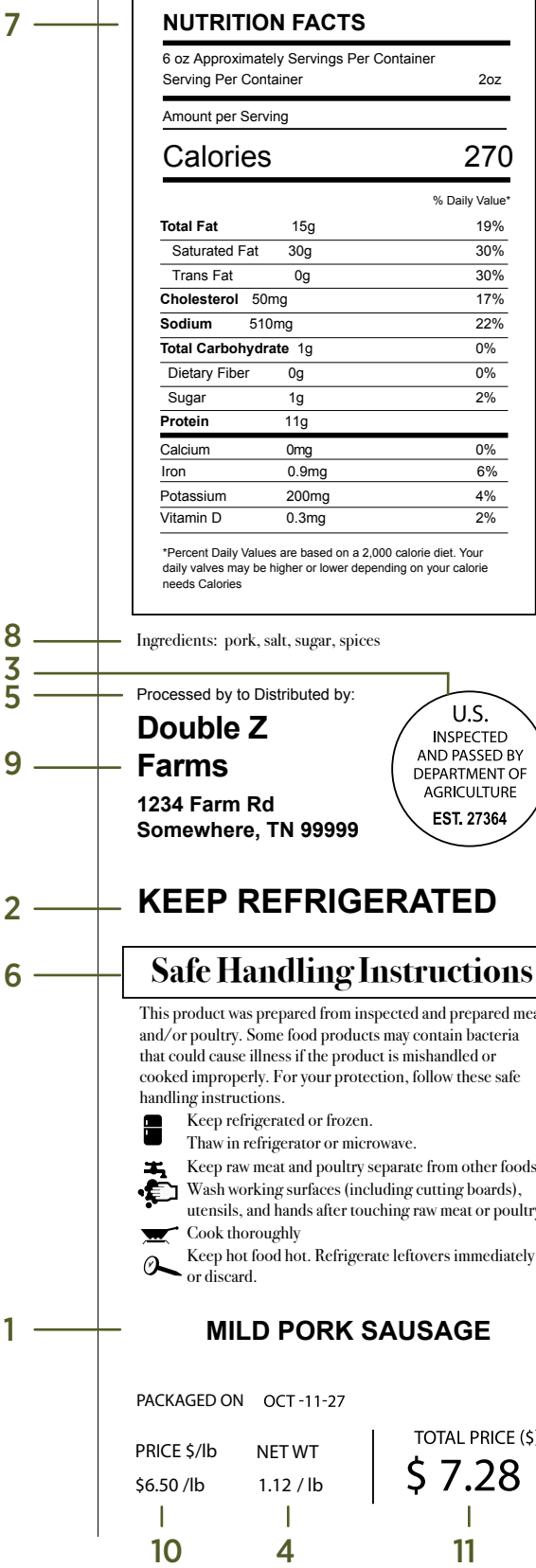


Figure. 1. Example Meat Label Illustrating Minimum Labeling Requirements

USDA LABEL APPROVAL PROCESS

To adhere to federal regulations, all labels used on meat products processed under USDA inspection must be approved by FSIS before their use in commerce. Labels must include a set of minimum features and may include optional statements or claims.

Labels are approved in one of two ways: 1) generic approval and 2) sketch approval (9 C.F.R. § 412.1-412.2.). Generically approved labels do not require a formal submission to FSIS for evaluation and approval as long as they meet label requirements, however, FSIS field inspectors routinely verify all labels, including those generically approved. Sketch-approved labels undergo a formal label application submission, evaluation and approval process. The following sections describe each label approval method and discuss the criteria by which meat product labels with special statements and claims require generic or sketch approval.

Generic Approval

Generically approved meat product labels contain the minimum set of eight mandatory USDA labeling features (9 CFR § 412.2) and may also include statements and claims deemed factual by FSIS without the need for additional validation or verification by the FSIS Labeling and Program Delivery Staff. Farm or brand logos may be generically approved unless there is a claim included in the logo that requires submission for sketch approval.

Examples of claims that may be generically approved include:

- Authentic support the use of the logo on the label)
- All, 100%, Pure
- 100% Steer/Made with 100% steer
- Aged/Dry Aged/Wet Aged
- Air Chilled
- Country of Origin Labeling Statements according to 9 CFR 317.8 (b)
- Geographic Claim
- Geographic Logo
- State Endorsement Programs (must have documentation in the labeling record dated within the last year to
- Family Farm Raised
- Family-owned Ranches
- Fresh/Farm Fresh
- Homegrown by Heroes Logo
- No Artificial Flavors
- Noncertified Religious Exempt Product (Halal, Kosher)
- Premium
- Preservative Free

Additional claims eligible to be generically approved are listed in the FSIS Guideline for Label Approval and Food Standards and Labeling Policy Book. FSIS also publishes a document called FSIS Guideline for Label Approval, providing guidance for producers to assist producers and establishments in meeting labeling requirements. FSIS updates the documents periodically as regulations or claims being used evolved.

Claims that may be generically approved must meet any definitions or requirements described in the USDA FSIS Food Standards and Labeling Policy Book. For example, to use the term “aged” on a label, the product must meet this definition [11, p. 7]:

Aging is the process by which fresh beef (carcasses or cuts) are held in a controlled environment for a specified period of time of slaughter, to allow enzymatic activity to degrade complex proteins and promote the development of flavor and tenderness. The term “Aged” on a label must be qualified, e.g., “Aged 65 days.”

Another example is that producers may make claims such as “Product of the USA” or “Made in the USA” when the product is made from an animal that was born, raised, slaughtered and processed in the United States. If additional ingredients are added, those ingredients must also be grown and processed within the country [11].

Meat processing establishments should ensure that meats packaged in their facilities are properly labeled according to FSIS labeling requirements. Establishments should maintain labeling records that support the statements and claims used on labels. FSIS inspection program personnel (IPP) working in federally inspected meat processing facilities do not approve labels, however, they may randomly select meat products to review. In these cases, they verify that labels contain all mandatory labeling features and facilities are maintaining appropriate labeling records [10].

Sketch Approval

Labels bearing special statements and claims require sketch approval. Special statements and claims are claims, logos, trademarks and other symbols on labels that are generally not defined by FSIS regulations or in the Food Standards and Labeling Policy Book [10].

Sketch approval involves a formal application submission, evaluation and approval process by FSIS Labeling and Program Delivery Staff (LPDS). The application must be accompanied by a sample label, hence the term “sketch,” as well as documentation supporting the special statement(s) and claim(s). Acceptable label sketches include a printer’s proof, a computer-generated image, a hand-drawn copy or any other label replica that clearly displays the label’s features, size and location on the meat product [7, p. 8].

Examples of documentation supporting special statements and claims may include a producer affidavit describing their production protocol, feed tags or third-party certification. The Appendix section provides an example label sketch and producer affidavit for a farmer seeking approval to use the special claim, “100% Grass-Fed Beef,” on their meat product label.

There is no comprehensive list of special statements and claims requiring sketch approval because there is an infinite number of potential statements and claims that can be created by producers. The FSIS Guideline for Label Approval provides the most up-to-date list of various special statements and claims requiring sketch approval by FSIS LPDS [10]. Additional information is also provided in the FSIS Guideline on Substantiating Animal-Raising or Environment-Related Labeling Claims [6]. Some examples of special statements and claims listed in the FSIS Compliance Guidance for Label Approval document that direct marketing meat producers often use on their meat product labels that require sketch approval include:

- All Natural, 100% Natural
- No Artificial Ingredients
- No Additives (only permitted on single ingredient items)
- No Preservatives
- No Added Hormones, No Hormones Administered, No Steroids Administered (May require a disclaimer such as, “Federal regulations prohibit the use of hormones in poultry.” See additional information later in this section.)
- No Gestation Crates
- Raised Without Antibiotics
- Grass Fed
- Grass Fed, Grain Finished
- Pasture Raised
- Environmentally Raised
- Free Range
- Sustainably Raised
- Organic
- Humanely Raised
- Breed claims
 - Angus, Certified Angus, Hereford, Berkshire, etc.
- Local claims
 - Local, Locally Raised, Locally Grown, Locally Sourced, etc.
- Regenerative Claims
 - Raised Using Regenerative Agriculture Practices
- Third-party raising claim programs
 - Agriculture Marketing Service (AMS) Process Verified, Animal Welfare Association, etc.
- Certified Claims
 - USDA Certified Organic, certified Halal, Certified Women’s Business Enterprise, etc.
- Omega Fatty Acid Claims
- Heart Healthy, heart smart, etc.
- Gluten Free

In some cases, farm or business names contain special statements and claims. For example, a farm named “Smith Grass-Fed Beef” includes a grass-fed beef animal production claim. In this example, if the farm name including a claim is displayed outside of the label’s signature line (i.e., where the name or trade name and address of the manufacturer, packer or distributor are located), the producer would be required to obtain sketch approval from FSIS LPDS. Farm names or logos without claims may be included on the label without sketch approval.

In addition, not all claims are appropriate for every type of meat product. For example, because the Food and Drug Administration only allows hormones administered in beef cattle and lamb production, the use of the statement, “No Hormones Administered,” for poultry, veal calves, swine, goat or mature sheep must be immediately followed with the statement, “Federal regulations prohibit the use of hormones in _____ (insert species)” [6].

STEPS TO SUBMITTING A SPECIAL CLAIM FOR SKETCH APPROVAL

A step-by-step explanation of the sketch approval application process may help producers prepare and submit their label approval application to FSIS LPDS. The sketch approval application process can be summarized in five steps.

Step 1: Communicate with Processors

Producers should communicate their plans of submitting a label approval application with their meat processor. USDA-inspected meat processing facilities are the entities that ultimately need approval from FSIS LPDS to apply labels to products they are processing. Labels cannot be added to meat products by the producer outside of the processing facility.

Step 2: Develop the Label Sketch

Producers will develop the label sketch to submit with the label application. The label sketch can be a printer’s proof, a computer-generated image, a hand-drawn copy or any other label reproduction as long as it clearly displays the label’s features, size and location on the meat product [7]. By working closely with their meat processor, producers can ensure that their label sketch contains the eight mandatory labeling requirements. Further, some local meat processing facilities may help producers design the label sketch, though they may charge an additional fee for this service. Appendix A shows an example label sketch for the special label claim, “100% Grass-Fed Beef.”

ZZZ FAMILY FARMS
390 20th Street, Daisy, TN 34567
(356) 235-6542

100% Grass-Fed Beef
GROUND BEEF

Safe Handling Instructions

This product was prepared from inspected and prepared meat and/or poultry. Some food products may contain bacteria 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 food hot. Refrigerate leftovers immediately or discard.

KEEP FROZEN **NET WT 1 / LB**

Processed by:
L & M Custom Slaughtering
1234 Farm Rd, Somewhere, TN 99999

Step 3: Prepare Supporting Documentation

Producers requesting approval to use special statements and claims on meat product labels will need to compile and submit adequate supporting documentation to justify their special statements and claims. FSIS requires supporting documentation to help verify that the special statements and claims used on meat product labels are truthful and not

¹Labels may be added to meat products at a licensed retail food store. However, any special statements and claims featured on these labels require FSIS approval [4].

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 11, 15, and 16 is exempt from mandatory disclosure under the Freedom of Information Act 5 U.S.C. 552(b)(4). APPLICANT: See Page 5 for instructions.		1. AGENT NAME, ADDRESS, TELEPHONE NO. (If using an Agent, complete this block, otherwise leave blank.)	2. FOR USDA USE ONLY	3. FOR USDA USE ONLY	4. ESTABLISHMENT NO. / FOREIGN COUNTRY (If applicable) 4a. TYPE OF PRODUCT <table style="width: 100%;"> <tr> <td>☐ Egg</td> <td>☐ Meat</td> </tr> <tr> <td>☐ Poultry</td> <td>☐ Other</td> </tr> </table>	☐ Egg	☐ Meat	☐ Poultry	☐ Other
☐ Egg	☐ Meat								
☐ Poultry	☐ Other								
5a. NAME OF PRODUCT									
5b. HACCP PROCESS CATEGORY (Select one) ☐ 03J: Slaughter - all species ☐ 03B: Raw Product - ground ☐ 03C: Raw Product - not ground ☐ 03D: Thermally processed - commercially sterile ☐ 03E: Not heat treated - shelf stable ☐ 03F: Heat treated - shelf stable ☐ 03G: Fully cooked - not shelf stable ☐ 03H: Heat treated but not fully cooked - not shelf stable ☐ 03I: Product with secondary inhibitors - not shelf stable		6a. TYPE OF APPROVAL REQUESTED ☒ SKETCH ☐ TEMPORARY ☐ EXTENSION OF TEMPORARY 6b. WAS THE LABEL PREVIOUSLY APPROVED? ☐ YES → Date of approval: _____ ☐ NO Prior approval number: _____ Number of labels on hand: _____ Number of days requested: _____		7a. AREA OF PRINCIPAL DISPLAY PANEL (Square inches) 7b. TOTAL AVAILABLE LABELING SPACE FOR ENTIRE PACKAGE (Square inches)					
8. Does this label include a "USDA-AMS Child Nutrition Program CN-Logo?" ☐ Yes ☐ No									
9. (FOR USDA-AMS USE ONLY) CN Identification Number Assigned									
10. Are there any special claims, guarantees, or foreign language on the label? ☒ YES ☐ NO (If yes, check all that apply) <table style="width: 100%;"> <tr> <td style="vertical-align: top;"> ☐ Allergen Statements ☐ Animal Production/Breed/Raising ☐ Certified/Verified ☐ Environmental/Green ☐ Export Only Labels w/deviations from Domestic Requirements ☐ Foreign Language ☐ Geographic/Undefined Style </td> <td style="vertical-align: top;"> ☐ Grading Terms ☐ Guarantees ☐ Natural/Organic ☐ Nutrition/Health ☐ Religious Exemption </td> <td style="vertical-align: top;"> ☐ Other Claims: Specify </td> </tr> </table>						☐ Allergen Statements ☐ Animal Production/Breed/Raising ☐ Certified/Verified ☐ Environmental/Green ☐ Export Only Labels w/deviations from Domestic Requirements ☐ Foreign Language ☐ Geographic/Undefined Style	☐ Grading Terms ☐ Guarantees ☐ Natural/Organic ☐ Nutrition/Health ☐ Religious Exemption	☐ Other Claims: Specify	
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11. NAME AND ADDRESS OF FIRM (Below and between dots)		12. SIGNATURE OF APPLICANT OR AGENT		13. DATE					
14. (FOR USDA USE ONLY) CONDITIONS APPLYING TO USE OF LABELS OR DEVICE									

FSIS FORM 7234-1 (11/16/2011)

REPLACES FSIS FORM 7234-1 (09/01/2009), WHICH IS OBSOLETE.

Figure 2. FSIS Form 7234-1 has sixteen sections that must be completed. The above image shows the application form's sections one through ten.

misleading to consumers. Supporting documentation provides a detailed explanation of how the proposed statements and claims accurately describe the meat product. The supporting documentation required for the label approval application varies by the characteristics of the special statements and claims (i.e., production claims, breed claims, negative claims, etc.). Some of the more common supporting documentation includes:

- Signed affidavits and testimonials on company letterhead confirming the truthfulness of the special statements and claims.
- Product identification and segregation system for conforming and non-conforming meat products.
- Production protocols from birth to harvest, such as livestock identification and segregation methods via tags or other animal marking devices.
- Feed formulation documentation for livestock, including information on animal diet during inclement weather (e.g., specific diet regime for grass-fed or grain-fed beef).
- Operational protocol for sick and injured animals.
- Third-party verification and certification documentation.
- Scientific evidence that helps confirm the special statements and claims used on product labeling.

The publication, FSIS Guideline on Substantiating Animal-Raising or Environment-Related Labeling Claims, provides details regarding the required supporting documentation for specific special statements and claims such as "Grass Fed," "Pasture Raised," "Free Range" and "Raised without Antibiotics" [6]. Appendix B features an example producer affidavit for making the special claim, "100% Grass-Fed Beef."

Step 4: Complete Label Approval Application

After developing their label sketch and supporting documentation, producers will complete the label approval application either online via the Label Submission and Approval System (LSAS) or using paper form FSIS Form 7234-1. Producers will need to consult with their meat processor to complete the label approval application, as it requests the meat processing facility's establishment number, product formula (for multi-ingredient products) and processing procedures. If a producer uses more than one processor simultaneously, label approval applications must be submitted and approved for each establishment. Once approved, the establishment number on the label may be changed generically (without further sketch approval), as long as the label does not include the certified organic claim.

USDA FSIS prefers applicants use the online LSAS, and online label approval applications for special statements and claims are processed more quickly. FSIS has developed the LSAS: User Guide for Industry Users with instructions and screenshots demonstrating the system.

Alternatively, producers may choose to submit hard copies of materials using FSIS Form 7234-1, shown in part in Figure 2. The form may be downloaded from the USDA FSIS Labeling Procedures webpage. LPDS staff will scan the paper application materials for integration into the online LSAS system for evaluation. Applications must follow guidance developed for submission of paper applications or these applications will be returned without evaluation.

Producers making special statements and claims for meat product labels will mark “Sketch” in Section 6a and will check “Yes” in Section 10, where applicants are asked to indicate whether there are “any special claims, guarantees, or foreign languages on the label.” Page 5 in the paper-based FSIS Form 7234-1 provides detailed instructions for completing and submitting the label approval application.

Step 5: Submit Label Approval Application

Once the producer has prepared their label sketch, gathered the appropriate supporting documentation and completed application online or via FSIS Form 7234-1, the label approval application is ready for submission to FSIS LPDS. Applying for sketch approval well before marketing products gives producers time to modify their label approval application, special statements or claims, supporting documentation, or label sketch, if requested by FSIS LPDS.

The complete application can be submitted to FSIS by either the producer or processor. If submitting the paper-based FSIS Form 7234-1, a complete label approval application requires:

- ☒ Two copies of FSIS Form 7234-1 printed single-sided and with pages paper clipped together.
- ☒ Two copies of the label sketch printed on an 8.5-by-11-inch size paper, also single sided.
- ☒ All appropriate supporting documentation printed single sided and paper clipped together.
- ☒ A return, pre-paid mail envelope.

Producers should also provide their meat processing facility with additional copies of the application, the label sketch and the supporting documentation for their records. If all meat product labels, including statements and claims made on labels, will be identical except for the cut names, producers may submit the application, a label sketch for at least one cut as an example, and attach a list of other cuts for which the label will be used. FSIS refers to this as “blanket approval” [7].

FSIS recommends sending applications and supporting material via UPS, FedEx, or courier to:

USDA, FSIS, OPPD, LPDS
Labeling Distribution Unit
Room 1255
1400 Independence Avenue, SW
Washington, DC 20250-3876

The application materials may be mailed via the U.S. Postal Service; however, irradiation of mail can alter the physical appearance of the application making it difficult or impossible to scan for integration into the LSAS system. Producers choosing to send applications via U.S. Postal Service may mail to:

USDA, FSIS, OPPD, LPDS
Labeling Distribution Unit
Stop Code 3786, Room 1255

1400 Independence Avenue, SW
Washington, DC 20250-3876

Applicants may contact the Labeling and Program Delivery Staff Distribution Team to confirm receipt or check on the status of label applications by calling (301) 504-0883 [12].

SUMMARY

Understanding USDA FSIS’s labeling requirements can simplify the label approval process for making special statements and claims on meat product labels. Producers making special statements and claims on their meat product labels and point-of-purchase promotional materials should remember:

- Meat product labels are approved by FSIS prior to their use in commerce.
- Labels can be generically approved or sketch approved, depending on the type of information and/or special statements or claims included on the label.
- Sketch approval for special statements and claims requires that producers submit a label approval application to FSIS LPDS with a label sketch and supporting documentation to justify the special statements and claims.

ONLINE RESOURCES

USDA FSIS Label Submission and Approval System: tiny.utk.edu/LSAS

LSAS: User Guide for Industry Users: tiny.utk.edu/LSASGuide

Downloadable FSIS Form 7234-1: tiny.utk.edu/7234-1

Guidance developed for FSIS submission of paper applications: tiny.utk.edu/ApiIntegration

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APPENDIX

The sketch approval label application process for special statements and claims requires a sketch of the meat product label and supporting documentation to justify the special statements and claims. An example label sketch (Appendix A) and producer affidavit (Appendix B) for the special claim, “100% Grass-Fed Beef,” are provided to help direct farm marketers understand the label approval application requirements for sketch approval.

Appendix A. Example Label Sketch for “100% Grass-Fed Beef” Claim*



ZZZ FAMILY FARMS
390 20th Street, Daisy, TN 34567
(356) 235-6542



100% Grass-Fed Beef
GROUND BEEF

Safe Handling Instructions

This product was prepared from inspected and prepared meat and/or poultry. Some food products may contain bacteria 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 food hot. Refrigerate leftovers immediately or discard.

KEEP FROZEN

NET WT 1 / LB

Processed by:
L & M Custom Slaughtering
1234 Farm Rd, Somewhere, TN 99999

Appendix B. Example Producer Affidavit for “100% Grass-Fed Beef” Claim

[Farm Name] 100% Grass-Fed Beef Protocol

All cattle are produced exclusively on a forage diet, other than mother's milk, from birth until harvest. No grain or grain supplements are fed to cattle marketed as [Farm Name] 100% Grass-Fed Beef. In the unlikely event cattle are known to have accessed and consumed grain or grain supplements, affected cattle will be segregated and removed from the grass-fed program.

All cattle are produced from birth until harvest by [Farm Name]. Calves graze with their mothers on pasture until weaning. Fence-line weaning allows calves to remain on pasture while limiting stress. Weaned calves are moved to new pasture through rotational grazing management practices as often as needed to meet their nutritional requirements and based on forage availability and quality. Cattle are provided free-choice access to fresh water, loose mineral and salt.

Cool season forages consist of annual ryegrass, pearl millet, red and white clover, tall fescue, wheat and forbs. Warm season forages of bermudagrass, big and little bluestem, gamagrass, red and white clover and forbs. Cattle are fed hay and haylage during times of limited forage growth or availability. Hay and haylage are produced from alfalfa and excess forage on [Farm Name], when possible. High quality hay is purchased when necessary to supplement farm stores and provide proper nutrition.

The protocol above is an accurate account of the production methods used by the owner/operator to produce grass-fed beef by [Farm Name] as of [date].

[Signature]

[Typed Name]

[Title e.g., Owner/Operator]

[Date]



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