



LIVESTOCK FEEDING CLAIMS AUDIT PROGRAM

1 Purpose

This document provides the requirements for the Livestock Feeding Claims Audit Program. It also provides the requirements used for the objective evaluation of a program submitted for approval and monitored by the Agricultural Marketing Service (AMS), Livestock and Poultry Program, Quality Assessment Division (QAD).

2 Scope

The Livestock Feeding Claims Audit Program may be used by U.S. companies that request to have livestock feeding claims that are applied to livestock, meat, and agricultural products verified and monitored by the QAD. A company's program may include all phases of production and marketing, or any portion as described in the scope of the program.

As an alternative to the requirements outlined in this document, companies may apply the requirements of the USDA Process Verified Program to meet the livestock feeding claims. The requirements of the USDA Process Verified Program (PVP) are defined in QAD 1001 Procedure: *USDA Process Verified Program*.

3 References

QAD 1000 Procedure: *Quality Systems Verification Programs, General Policies and Procedures*
[Grain Fed Diet Clarification](#)

[USDA Livestock Feeding Claims Audit Program website](#)

[USDA FSIS: Export Library – Requirements by Country website](#)

QAD 1013 Procedure: *USDA EV Program Specified Product Requirements NHTC for the European Union*
[USDA Non-Hormone Treated Cattle Program website](#)

4 Responsibilities

- 4.1 Companies must meet all policies, procedure, and requirements outlined in this document and QAD 1000 Procedure.
- 4.2 The QAD is responsible for conducting audits of companies in accordance to the QAD 1000 Procedure to verify that the requirements of the Livestock Feeding Claims Audit Program are met and maintained.

5 Audit Frequency

Approved PVP programs are audited at least once per fiscal year (October 1 to September 30) and QSA programs are audited at least twice per fiscal year. However, more frequent audits may be conducted (1) if either numerous major or minor non-conformances are identified during an audit; (2) if customer



complaints indicate an ongoing problem; (3) to satisfy specific requests as declared by customers, trading partners, or other financial interested parties; or (4) as directed by QAD.

A company that meets the livestock feeding claims through a USDA PVP is audited in accordance with the audit frequency outlined in QAD 1001 Procedure.

QAD may request records for review at any time.

6 Listing of Approved Programs

Companies who produce products that conform to the Livestock Feeding Claims Audit Program are listed on the *Official Listing of Approved Companies to the Livestock Feeding Claims Audit Program*. The Official Listing is available on the USDA website.

7 Livestock Feeding Claims

The following livestock feeding claims may be verified under the Livestock Feeding Claims Audit Program.

7.1 Specified Livestock Feeding Claim

7.1.1 The company may specify its own livestock feeding claim. The following information must be provided for a specified claim:

- a) The ration;
- b) The number of days on feed, and
- c) The rate of feed (lbs per day per head).

Note: This information is included on the *Official Listing*.

7.2 European Union (EU) High Quality Beef

Meat and meat products derived from animals that meet this livestock feeding claim are eligible for certification by FSIS for export to the European Union (EU) and Switzerland as High Quality Beef. Refer to the USDA FSIS export requirements website for additional European Union requirements.

7.2.1 Quota A: Cattle must have been fed for 100 days or more on a nutritionally balanced, high energy feed concentration ration containing no less than 70% grain, and at least 20 pounds feed per day per head.

Note 1: Grain is defined within the *Grain Feed Diet Clarification* document.

Note 2: The 100 days does not have to be consecutive.



Note 3: Beef must be obtained from cattle less than 30 months of age in order to ship under Quota A.

Note 4: Beef graded “Choice” or “Prime” according to the USDA standards automatically meets the Quota A.

- 7.2.2 Quota B: Cattle must have been fed the last 100 days on a diet containing not less than 62% of concentrates and/or feed grain co-products on a dietary dry matter basis that meet or exceed a metabolisable energy content greater than 12.26 mega joules per one kilogram of dry matter ($12.26 \text{ MJ/kg} = 60.318 \text{ NEg per 100 lbs}$). The heifers and steers that are fed the diet described above shall be fed, on average, no less than 1.4% of live body weight per day on a dry matter basis.

Note 1: Carcasses must undergo a carcass evaluation by the QAD.

Note 2: Beef must be obtained from cattle less than 30 months of age in order to ship under Quota B.

Note 3: In addition to meeting Quota requirements, cattle must also be sourced from an approved NHTC Program, in order to be exported to the European Union.

7.3 Never Fed Beta Agonists Claim

Beta Agonists are substances approved by the Food and Drug Administration (FDA) to improve weight gain, feed efficiency, and carcass leanness in confinement animals raised for slaughter. According to FDA requirements, beta agonists are labeled only for use during the finishing period of the animal's life. This claim verifies that animals have never received beta agonists at the location(s) where they reside during the finishing period of their life.

8 Livestock Feeding Claims Audit Program Requirements

Livestock feeding claims must be supported by the requirements of the Livestock Feeding Claims Audit Program. Companies must submit a documented program that addresses the program requirements as outlined below.

Note: Where a company chooses to meet the livestock feeding claims through an approved Process Verified Program, these requirements are already included within the USDA Process Verified Program.

8.1 Monitoring and Measurement of Processes

- 8.1.1 The company must apply suitable methods for monitoring and, where applicable, measurement of processes. These methods must demonstrate the ability of the processes to achieve planned results.
- 8.1.2 When planned results are not achieved, correction and corrective action must be taken, as appropriate, to ensure conformity of the product.

8.2 Monitoring and Measurement of Product



8.2.1 The company must monitor and measure the characteristics of the product to verify that product requirements have been met. This must be carried out at appropriate stages of the product realization process in accordance with planned arrangements.

8.2.2 Non-conforming product must be controlled and not used within the program.

8.3 Identification and Traceability

8.3.1 The company must have a documented procedure to identify product by suitable means throughout product realization, where appropriate.

8.3.2 The documented procedure must describe the method for:

- a) Identifying the product throughout product realization;
- b) Controlling and recording the unique identification of the product; and
- c) Identifying the product status with respect to monitoring and measurement requirements.

8.3.3 The method for identifying the product must be such that identification will transfer through all phases of product realization, from receipt into the program through production to delivery.

8.4 Corrective Action

8.4.1 The company must take action to eliminate the cause of non-conformances in order to prevent recurrence.

8.4.2 Corrective actions must be appropriate to the affects of the non-conformance encountered.

8.5 Control of Documents

8.5.1 The company must control all documents required by this program.

8.5.2 Control of documents includes at a minimum:

- a) Documents must contain the current revision status of the document on each page.
- b) The company must ensure that relevant versions of applicable documents are available at all associated sites where program activities are conducted.
- c) The company must prevent the use of obsolete or unapproved documents.
- d) Documents must be retained for the timeframe necessary to provide evidence of conformance.

8.6 Control of Records

8.6.1 The company must establish and maintain records to provide evidence of conformity to program requirements, to livestock feeding claims, and of the effective operation of the program.



8.6.2 Control of records includes at a minimum:

- a) The company must control all records required by this program.
- b) Records must be stored in a manner so as to prevent loss, damage, or alteration.
- c) Records must be legible, easily accessible, and readily available.
- d) Records must be retained for the timeframe necessary to provide evidence of conformance.

8.7 Documented Procedures

- 8.7.1 The company must establish, document, implement, and maintain documented procedures to cover situations where their absence could lead to deviations from the livestock feeding claims and conformance to this program.

8.8 Shipping Documentation

- 8.8.1 Shipping documentation (bills of lading, shipping manifests, letters of guarantee, or electronic transmissions) must accompany each shipment of animals and/or product that occurs due to sale or transfer of custody.
- 8.8.2 Shipping documentation must include a statement identify the animals and/or product as meeting the requirements of the Livestock Feeding Claim Audit Program for the specific claim. In addition, it must clearly identify the animals and/or product and the quantity.

For Example: "Animals meet the requirements of the Livestock Feeding Claim Audit Program for EU High Quality Beef Quota A, B, or A&B (Identify which quota the animals met)".

Jeff Waite, Branch Chief
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Appendix A – Definitions

- 1** Conforming Product: product within the program that meets, and can be verified as meeting, the livestock feeding claim.
- 2** Corrective Action: action to eliminate the cause of a detected non-conformance.
- 3** Correction: action to eliminate a detected non-conformance.
- 4** Documented Procedure: A procedure that is established, documented, implemented, and maintained.
- 5** Measurement: the actual determination of a value. Requires the use of a device to determine the numerical value of a product characteristic or process parameter at a given time.
- 6** Monitoring: a general term implying oversight over time.
- 7** Non-conforming Product: product within the program that does not meet, or cannot be verified as meeting the livestock feeding claim.
- 8** Planned Arrangements: arrangements that have been pre-determined under the program.
- 9** Procedure: a specified way to carry out an activity or process.
- 10** Product: a raw material or finished good. The type of product depends upon where it is within product realization. Under this program, a product may be live animals, meat, or other agricultural products.
- 11** Product Realization: the process of developing a product from initial acceptance of the raw materials through production to delivery that meets stated requirements.
- 12** Product Requirements: includes, but may not be limited to, the livestock feeding claims as outlined in Section 7 and the requirements of this program as outlined in Section 8.
- 13** Record: a document that states results achieved or provides evidence of activities performed.