Marketing Claims

Craig Morris, Ph.D.
Deputy Administrator
Livestock, Poultry, and Seed Program
USDA Structure

SECRETARY

Deputy Secretary

Director of Communications
Inspector General
General Counsel
Assistant Secretary for Congressional Relations
Assistant Secretary for Administration
Assistant Secretary for Civil Rights
Chief Information Officer
Chief Financial Officer
Executive Operations

Under Secretary for Natural Resources and Environment
  • Forest Service
  • Natural Resources Conservation Service

Under Secretary for Farm and Foreign Agricultural Services
  • Farm Service Agency
  • Foreign Agricultural Service
  • Risk Management Agency

Under Secretary for Rural Development
  • Rural Utilities Service
  • Rural Housing Service
  • Rural Business Cooperative Service

Under Secretary for Food, Nutrition, and Consumer Services
  • Food and Nutrition Service
  • Center for Nutrition Policy and Promotion

Under Secretary for Food Safety
  • Food Safety and Inspection Service

Under Secretary for Research, Education, and Economics
  • Agricultural Research Service
  • National Institute of Food and Agriculture
  • Economic Research Service
  • National Agricultural Library
  • National Agricultural Statistics Service

Under Secretary for Marketing and Regulatory Programs
  • Agricultural Marketing Service
  • Animal and Plant Health Inspection Service
  • Grain Inspection Packers and Stockyards Administration
AMS Overview

Mission:

To facilitate the competitive and efficient marketing of agricultural products.

Vision:

We envision a marketing system that quickly and efficiently moves wholesome, affordable agricultural products from the farm to the consumer.
AMS – Livestock, Poultry and Seed Program
Marketing Claims

• USDA Grading Service
  o Grade Standards

• Quality Standards Development
  o Assist with third party standards development

• Verification Services
  o Marketing Claims verified by on-site audits of third party standards
USDA Quality System Verification Programs

- Include everything from the USDA Process Verified Program to Quality System Assessment Programs to Export Verification Programs

- Outlined in 7 CFR Part 62

- Provided on a cost recovery basis and does not regulate if a claim is truthful and not misleading.
USDA Process Verified Program

• AMS PVPs mean that a company has accepted USDA as their auditor and that they agree to make the standards behind their marketing claims transparent on the USDA website

• Developed in 1995

• Based on ISO 9001 Quality Management Systems Standard

• Only Program to allow use of the USDA PVP shield
History of the PVP

In 1997, an audit-based breed control program was developed for live animals and products from such animals.

In the late 1990s, the Non-Hormone Treated Cattle (NHTC) Program was developed in response to the EU discovering prohibited growth hormones in beef products shipped from the U.S.

In 1999, the PVP was revised to include quality management system criteria consistent with ISO 9001 requirements. This provided the necessary oversight and confidence in third-party auditing firms that certified live animals to specified marketing claims.

In 2003, the PVP addressed the Bovine Spongiform Encephalopathy (BSE) problem in the U.S. that triggered the closure of most export markets for U.S. beef.

In 2006, the Poultry PVP began with Perdue Foods claiming their chicken is raised on an all vegetarian diet at a single complex only to later expand their PVP company-wide having 7 PVP claims.

Over 20+ years, the PVP has grown from the need for livestock claims to include many other facets within the agricultural community including the recent claims made by the poultry industry such as antibiotic claims and now Non-GMO claims.
PVP: What is it?

• AMS works with customers to develop an auditing solution that verifies a given claim

• Provides independent, 3rd party verification of marketing claims or processing points.

• User-fee funded – clients are charged per hour for AMS services.

• Independent audits conducted by qualified AMS auditors using ISO guidelines for quality management systems auditing.

• Claims are clearly defined and transparent – Approved clients and claims are listed on AMS PVP Webpage.
PVP: What It Is Not

• NOT a regulatory program or regulatory-based
  
  o versus Organic Program, which is a USDA regulatory program that includes standards development and enforcement

• NOT a “label approval program or process”
  
  o Labels are regulated and approved by USDA FSIS or FDA as truthful and not misleading (for calories, ingredients, etc.)

• NOT a stand-alone “Standard” – PVP merely verifies a standard submitted by a company
Label Claim Approval

• FSIS, not AMS, has authority to approve label claims for meat and poultry
  
  o In cases where companies want to make specific label claims about the product, FSIS requires that the company provide sufficient documentation to ensure such label claim is truthful and not misleading.

  o AMS PVPs primarily convey that the firm has a strong commitment to quality management and that they are allowing AMS to verify their system.

  o Labels and point of sale marketing materials with the PVP shield (including websites) are reviewed by AMS to ensure that labels claims made in association with the shield are aligned with the PVP points verified.
Production Claim Types

- Examples of Production Claims Verified by AMS under PVP
  - No Antibiotics Ever
  - Responsible Antibiotic Use
  - Raised on an all vegetarian diet
  - No Hormones or steroids - companies of livestock and meat products
  - Raised in accordance with the Industry Standards
  - Age and source verified
  - Non-GMO/GE
Audit Process for Marketing Claim Verification

QAD 1000 Procedure – QSVP General Policies and Procedures

1. Application for Service
2. Initial Desk Audit
3. Audit Plan and On-site Audits
4. Audit Findings and Report
5. Correcting Identified Non-conformances
6. Approval Status
Contacts for AMS PVP Programs

• Jennifer Porter, Director, LPS - Quality Assessment Division
  Jennifer.Porter@ams.usda.gov  202-690-3147

• Jeff Waite, Branch Chief, LPS - Quality Assessment Division, Audit Services Branch  202-720-4411
  Jeffrey.Waite@ams.usda.gov

• Steve Ross, Manager of Field Operations, LPS - Quality Assessment Division, Audit Services Branch  202-309-1506
  Steve.Ross@ams.usda.gov