

REGULATIONS FOR SPECIFIC PRODUCTS

SELLING BEEF, PORK, LAMB, GOAT AND OTHER MEAT



Growing consumer demand for local, natural, pastured, grass-fed, and organic meat creates new opportunities for producers. Selling beef, pork, goat, and other meat as “Custom-exempt” is a common option. However, selling USDA-inspected meat is a significant challenge, due to the loss of local processing infrastructure. Producers will want to consider their customer desires, market opportunities, and their own business goals when navigating the options for meat processing and sale.

This fact sheet includes information about:

- Meat processing and sales overview.
- WSDA-licensed custom meat slaughter and processing.
- Exotic and game animals.
- USDA-inspected meat sales.
- Health department requirements for selling meat.
- WSDA Food Storage Warehouse License.
- USDA FSIS Retail Store Exemption.
- Additional resources.

Information in this fact sheet is our best understanding of the current laws and regulations at the time of publication. If there is a conflict between what is written and what is contained in law, the applicable law prevails. Laws and regulations also are subject to change. Please refer to the contacts listed for the most up-to-date information.



Meat Processing and Sales Overview

Meat processing in the United States is regulated by the Federal Meat Inspection Act. This act applies to processing cattle, sheep, swine, and goats. In some voluntary situations, when requested by the animal owner, it might include exotic animals raised for meat (e.g., buffalo, game-farm animals). Note: there may be restrictions on game-farm licensing, and wild-game farmers must contact the Washington Department of Fish and Wildlife.

In order to meet the federal requirements, animals must be processed at plants inspected by the USDA Food Safety and Inspection Service (FSIS). However, it is difficult for many small producers to access these federally inspected plants. The other option for producers is to sell their cattle, sheep, swine, and goats as live animals. The purchaser may then have the animals slaughtered and processed for their own consumption only by a Custom Meat business licensed by the WSDA Food Safety Program. Producers raising exotic animals have the additional options of getting a WSDA Food Processor License to slaughter and process those animals at their own facility.

Table 1 on the following page summarizes the key differences between what is allowed with Custom Meat and USDA-inspected cattle, sheep, swine, and goat meat. **Table 2** summarizes the key differences between what is allowed with a WSDA Food Processor and USDA-inspected exotic meat.

Table 1. WSDA-licensed Custom Meat vs. USDA-Inspected Meat

SPECIES: CATTLE, SHEEP, SWINE, AND GOATS	WSDA-LICENSED CUSTOM MEAT	USDA-INSPECTED MEAT
What can be sold?	eighth, quarter, half, or whole portions sold of live animal*	whole, primal, or meat processed into cuts
Marketing options?	direct to end consumer while animal is live	direct, retail and wholesale
Are out-of-state sales allowed?	No	Yes

*Portions can be less than one-eighth as long as paperwork records document that the animal is fully owned by the multiple customers before slaughter.

Table 2. WSDA-licensed Food Processor vs. USDA-Inspected Meat

SPECIES: EXOTIC, INCLUDING BUFFALO, BEEFALO, GAME-FARMED BIRDS	WSDA-LICENSED FOOD PROCESSOR	USDA VOLUNTARY INSPECTION **
What can be sold?	whole, primal, or meat processed into cuts	whole, primal, or meat processed into cuts
Marketing options?	direct, retail and wholesale	direct, retail and wholesale
Are out-of-state sales allowed?	Yes*	Yes

*Yes, only if the receiving state allows non-USDA inspected exotic meats.

**USDA may or may not agree to conduct voluntary inspection.

WSDA-licensed Custom Meat Slaughter and Processing

USDA's Custom Meat exemption allows for slaughter of and processing of meat for personal consumption. Under this exemption, producers can sell animals by live weight directly to the end consumer prior to slaughter (when still alive). Under the Custom Meat exemption, cattle, swine, sheep, and goat can be sold as whole, halves or quarters for the sole consumption of the owner. Meat is "uninspected" and cannot be resold. Selling meat by the piece or cut is not allowed under the Custom Meat exemption. All sales, slaughter, cut, and wrap must occur in Washington State.

Custom Meat is "uninspected" because it is not processed in a USDA-inspected facility. All packaged meat must be labeled "not for sale." Only the owner of the animal (i.e., the meat customer), their immediate family or non-paying guests may consume it. Custom Meat cannot be sold at farmers markets, to restaurants, or to grocery stores. Likewise, it cannot be donated to food banks.

Custom Meat animals must be slaughtered by people licensed by the WSDA Food Safety Program. On-farm slaughter is possible if the licensed custom farm slaughter uses a WSDA-approved mobile Custom Farm Slaughtering unit (i.e., meat truck). Animals may also be processed at a fixed Custom Slaughter Establishment licensed by WSDA to slaughter meat food animals for the owner. After slaughter, carcasses are tagged and delivered to a WSDA-licensed Custom Meat Facility for cutting and wrapping, aging, and freezing. Individual customers wanting specific cuts must call this facility with directions on how to cut the carcass. Customers also arrange to pick up their meat at the Custom Meat Facility.

Producers are advised to schedule butcher dates well in advance with their Custom Farm Slaughterer, especially during the busy season (August through November). In addition, producers need to ensure that space will be available for their animals at the cut-and-wrap facility on the day of slaughter.

For a list of WSDA-licensed Custom Slaughter and Custom Meat Facilities, contact the Food Safety Program by calling 360-902-1876 or emailing

foodsafety@agr.wa.gov. Additional information is also available by searching the WSDA website, agr.wa.gov. At the time of printing, WSDA licensees included:

- 69 Custom Farm Slaughterers
- 18 Custom Slaughter Establishments (fixed facility)
- 103 Custom Meat Facilities (cut and wrap)

Exotic and Game Animals Exotic animal meat (e.g., buffalo, beefalo, game-farmed birds) can be sold within Washington State when slaughtered and processed at a WSDA-licensed food processing facility or under voluntary inspection at a USDA-inspected plant and at the request of the animal owner. To sell exotic animal meat outside Washington State, animals must be processed at a facility that has a USDA grant of inspection for that particular species. In some cases, processing for out-of-state sales may occur at WSDA-licensed food processing facility, if the receiving state will accept non-USDA processed exotics.

A WSDA-licensed food processing facility can process a hunter's game animal for the sole use of the hunter's family or guests. This meat cannot be sold.

Elk and deer farms are not allowed in the state of Washington. The Washington Department of Fish and Wildlife prohibits the transport of elk and deer into Washington for processing.

USDA-Inspected Meat Sales

USDA inspection is required to sell **meat** from livestock (as opposed to selling live animals) and animal products through retail outlets, by the cut, or across state lines. Only USDA-inspected meat can be sold in retail or wholesale markets. The major benefit of meat processed at USDA-inspected facilities is that it may be sold at farmers markets, to restaurants, and to other wholesale and retail outlets. Producers must have the animals slaughtered and processed in USDA-inspected facilities. Some facilities require a minimum head number or work only on contract, and many process only beef.

For information regarding USDA-inspected facilities in the Pacific Northwest, contact the USDA Food Safety and Inspection Service District Office (for Washington

State) in Denver, Colorado at 303-236-9800, or use the USDA FSIS online "Meat, Poultry and Egg Product Inspection Directory." Find it in the menu at fsis.usda.gov, or search for it by name.

USDA-Inspected Mobile Slaughter Units

Given the limited USDA inspected meat processing facilities available, USDA-inspected mobile slaughter units (MSUs) provide a processing alternative, especially for small and/or independent producers. They are also referred to as mobile processing units (MPUs) or mobile meat processing units (MMPUs). Carcasses processed in a MSU are taken to a USDA inspected cut-and-wrap facility for cutting, aging, and packaging. One of the key differences with a MSU is that animals may be slaughtered with USDA inspection on a farm, eliminating the need to transport them to a fixed USDA slaughter facility.

USDA-inspected MSUs meet all the requirements of a USDA fixed plant, so meat processed in a MSU and taken to a USDA-inspected facility for cutting, aging, and packaging may be sold through retail outlets, by the cut, or across state lines. This also means that locations that wish to host a mobile slaughter unit must have sufficient infrastructure to support the unit, such as a paved pad for the unit, electricity hookups, or potable water.

In most cases in Washington State, a mobile unit does not travel to individual farms, but operates out of a fixed location, often near an associated cut-and-wrap facility. However, even if the units are not actively mobile, by being oriented to smaller producers in a region, they provide access to USDA slaughter and processing that might not be available to small-scale meat producers.

The national Niche Meat Processor Assistance Network (NMPAN) is an excellent resource for learning more about MSUs. Select "Mobile Slaughter and Processing" from the menu at nichemeatprocessing.org.

USDA-Inspected MSUs in Washington

Island Grown Farmers Co-op (IGFC) provides USDA-inspected mobile animal slaughter services to co-op members in San Juan, Whatcom, Skagit, Island, and Snohomish counties. Cut and wrap, storage, and some retail sales services are provided at IGFC's USDA-inspected facility in Bow. For more information visit igfcmcats.com, or contact 360-766-4273, info@igfcmcats.com.

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North Cascades Meat Producers Cooperative, based in Stanwood, is a farmer cooperative that serves members and other producers with USDA slaughter in Northwest Washington. They own a USDA-inspected mobile slaughter unit and offer USDA meat cut-and-wrap processing in partnership with local USDA-inspected cut-and-wrap processor. For more information visit ncmpc.org or northcascademeads.com, contact them at 360-722-1322 or acmegrassfed@gmail.com.

Smokey Ridge Meats in Chewelah, serving Stevens, Pend Oreille, Ferry, and neighboring counties has transitioned from hosting a mobile slaughter unit to offering slaughter and cut-and-wrap in their USDA-inspected plant. For more information visit smokeyridgewa.com, or contact them at 509-935-6213 or smokeyridgemeats@gmail.com.

At the time of publication, two additional mobile slaughter units were in development and slated to begin operation by 2020.

Serving King County and neighboring regions, a new unit will be located at **Carnation Farms** in Carnation and operated by Darron Marzolf. The unit is funded in part by King Conservation District. For current information, contact King County's Beefing Up Infrastructure Project, farmkingcounty.org, 206-477-1556, or patrice.barrentine@kingcounty.gov.

Serving the Methow, Okanogan, and general North Central region, a slaughter unit owned by Methow Conservancy will be located in Tonasket and leased for operation to **Double S Meats**, which will also offer USDA cut-and-wrap services. For more information, visit doublesmeats.com, or contact them at 509-486-4418, or info@doublesmeats.com.

Health Department Requirements for Selling Meat

Livestock producers who are direct marketing (e.g., selling at a farmers market, pop-up market, or farm stand) need to find out what permits are required by the local health jurisdiction where they will be selling meat. If you are selling in Seattle, you will need to check with Seattle-King County Public Health. In Tacoma, it is Tacoma-Pierce County Public Health. In Spokane, it is the Spokane Regional Health District. In most areas, the local jurisdiction will be the county

health department. A list of local health jurisdiction offices can be found by searching the Washington Department of Health website, doh.wa.gov.

All local health jurisdictions enforce the same Washington State Retail Food Code, but the permitting structure, fees, and inspection details vary from jurisdiction to jurisdiction. In addition, the local health jurisdiction may add requirements beyond the Retail Food Code.

Farmers markets and farm stands

The local health jurisdiction permits and inspects farmers markets and farm stands. Only USDA-inspected beef, pork, lamb, and goat can be sold at farmers markets, farm stands, and other retail outlets. Exotic meat must be slaughtered and processed at a WSDA-licensed food processing facility or a USDA-inspected plant to be sold at farmers markets, farm stands or other retail outlets.

Producers should check with the farmers market manager and health department early on to find out what is required. Questions to ask your local health jurisdiction include:

- ✓ What permit(s) are required for producers to sell meat at farmers market? Are fresh meat sales allowed? Or does all meat need to be frozen?
- ✓ What temperature needs to be maintained?
- ✓ Can producers use coolers, or is mechanical refrigeration required? If refrigeration or a freezer is needed, be sure to ask the market manager about the electricity and voltage available at the market site.
- ✓ Is a separate permit required for each market site or each day?
- ✓ How much does the permit cost? They may range significantly, anywhere from \$25 to \$900 per season.
- ✓ When are permits due or required to be renewed?

WSDA Food Storage Warehouse License

To store commercial foods, including meat, a WSDA Food Storage Warehouse License is required. The warehouse can be an acceptable building or dedicated room that can meet all license criteria. The warehouse must not be located in a domestic kitchen, but it can be located in a barn, out-building, or garage. Storage of any products for household use in warehouse freezers or refrigerators is not allowed. However, both household and commercial-style units are acceptable if used solely for business purpose. When applicable for the product, temperature logs must be maintained, and the warehouse is subject to inspection.

The license also allows farmers to rent refrigerator or freezer space to consumers for products that require substantial freezer space or cold storage. The Food Storage Warehouse License costs \$200 per year, expiring on March 31 of each year. Applications are available from the WSDA Food Safety Program at agr.wa.gov. For more information, please call 360-902-1876 or email foodsafety@agr.wa.gov.

USDA FSIS Retail Store Exemption

This exemption from the USDA allows for the processing and sale of meat through a retail store. The facility must be a permitted retail food establishment under inspection by the local health department jurisdiction.

USDA-inspected slaughter for all of the meat is required, but once the carcass is stamped, the retailer can cut and wrap the meat and sell it directly to consumers by the cut in their own store and their own satellite retail outlets, including a farmers market or farm stand. There are many parameters for what meets or does not meet this exemption.

USDA FSIS published updated guidance on exemptions to federal inspection in May 2018 titled, "FSIS Guideline for Determining Whether a Livestock Slaughter or Processing Firm is Exempt from the Inspection Requirements of the Federal Meat Inspection Act." Please refer to this document on the FSIS website, fsis.usda.gov, for specific details of this exemption.



As a general summary, in order to meet the USDA FSIS Retail Store Exemption, you need to:

1. Own the facility or pay for the facility's usage.
2. Have no more than two markets open at the same time.
3. Use only USDA-inspected slaughter for all of the meat.
4. Be permitted as a retail food establishment.

In addition, sales to any single customer in one day are limited to normal retail quantities. Those limits are defined by pounds of each meat animal species you can sell to a customer in one day. Please see the table below for the limit by species.

Limits on Pounds per species per customer per day

SPECIES	POUNDS
Cattle	300
Calves	37.5
Sheep	27.5
Swine	100
Goats	25

Meat cut, wrapped, and sold through this exemption must not be misbranded and cannot carry marks of USDA inspection, unless the meat food product was actually prepared under inspection and is still intact as prepared and packaged by the federally inspected establishment. Additional labeling requirements are outlined in the FSIS guidance publication.

Where and how you can sell meat under the Retail Store Exemption

A processor that's been granted a Retail Store exemption can sell through a variety of channels in addition to their permanent retail store. Only in-state sales are allowed through any channel. These include:

- Satellite retail outlets, including farmers markets, or roadside stand or truck.
- Online retail sales through a store's website or an online market.
- Hotel food service, restaurants, and similar institutions (HRI) like schools, or hospitals.

Additional conditions apply to sales online and to HRI food services.

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Online markets:

- The retail store must sell the product to the consumer.
- The meat food products offered on an online market must be owned by the retailer, not the online market.
- The online market must register with the USDA as a meat food handler with FSIS Form 5020-1.

Food service and other-than-household customers:

- Total annual sales to food service cannot exceed the calendar year dollar limitation found within the Federal Register at "Retail Exemptions Adjusted Dollar Limitations." In 2018 it was \$75,700.
- Total sales to food service cannot exceed 25 percent of the total annual sales of retail-prepared meat.

Helpful Resources on Processing and Selling Livestock

- Niche Meat Processors Assistance Network, nichemeatprocessing.org
- "Resource Guide to Direct Marketing Livestock and Poultry," Cornell University, smallfarms.cornell.edu
- "Animals for Food & Performance," Washington State University Food Systems, foodsystems.wsu.edu
- "Small-scale USDA Inspected Meat Processing," WSDA Farm Wisdom Videos, youtube.com/WSDAgov
- "Beef and Pork Whole Animal Buying Guide," Publication No. 13056, Iowa State University Extension, store.extension.iastate.edu
- Good Meat Project, goodmeatproject.org/programs



- 17. Selling to Schools and Other Institutions
- 20. Organic Certification
- 21. Eco-labels, Animal Welfare and Fair Trade Certifications
- 23. WSDA Food Processor License and Facilities
- 25. Food Product Recalls
- 46. Selling Poultry
- 47. Selling Rabbit Meat