

# White Meat Chicken Egg Roll

# Label IQ has determined that your submission has HIGH COMPLIANCE RISK

CERTIFICATE OF REVIEW
9 CFR 317 & 9 CFR 381

**Label Audit** 





**Label Elements:** 7 red alerts

9 orange alerts 6 yellow alerts

Claims & Special Statements:

5 red alerts

0 orange alerts

6 yellow alerts

**Supporting Documentation:** 

1 red alert

1 orange alert 0 yellow alerts

**Approval Status:** Must be submitted for USDA approval at LPDS offices in Washington D.C.

**Conditions:** Fix all errors and confirm compliance via re-audit

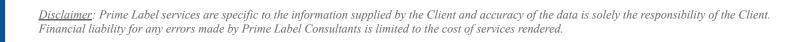
**Recordkeeping:** USDA establishments should maintain label records in accordance with 9 CFR 320.1 and 9 CFR 381.175. PLC

recommends maintaining this Certificate as a part of the label record. Per FSIS Directive 7221.1, all labels and label

records must be produced upon request for authorized USDA personnel within 24 hours.

Certificate No. 01JCGB5QHR54NP46V47 Certified by Prime Label Consultants, Inc. Date: November 15, 2024 Prime Label Food Group

Jane Doe
label.iq@primelabel.com







# **Gold USDA Label Audit**

Audit Category	Red Alert	Orange Alert	Yellow Alert	Notes
Label elements have been checked based on services ordered.	Red alerts are serious and violate a regulation.	Orange alerts violate a regulation.	Yellow alerts are cautionary & require further verification.	Results of checks are below (does not include state or international requirements). Label IQ does not audit ingredients for allergens.
Product Comments				- Label IQ measures font sizes only for Net Contents (based on an assumed 1:1 scale of the artwork provided). Measurements are experimental and should be confirmed on each label's printer proof.
Label Elements:				
Statement of Identity (Product Name) 9 CFR § 317.2(c), § 381.117, Food Standards & Labeling Policy Book, & FSIS Directive 7220.1		- "White Meat Chicken" in the product name conflicts with the name listed in the statement of ingredients		- 25 of 26 checks passed
Ingredient Statement 9 CFR § 317.2, § 381.118, § 424.21 & FSIS Directive 7220.1	- "Cane Juice" ingredient name(s) is not permitted - "Soy Sauce" multi-ingredients in the ingredients statement should have a sublist - "Flour, Soy Sauce" may contain a major allergen, ensure common name of the allergen is stated	- "Carots" ingredient name is misspelled		- 8 of 12 checks passed
Allergen Declaration FALCPA				- 1 of 1 checks passed
Net Quantity of Contents 9 CFR § 317.2(h)		- The metric amount is not consistent with the US common measure amount, (8.5 OZ equals 240g)	- "G" is incorrect; metric units may not be capitalized	- 34 of 36 checks passed
Handling Statement 9 CFR § 317.2(k)	- Handling Statement is missing, but required on your label			- 3 of 4 checks passed
Safe Handling Instructions 9 CFR § 317.2(I)				- 2 of 2 checks passed
Address Line 9 CFR § 317.2(c)(3) & (g)			- The place of business must be listed in a telephone or city directory in order to omit the street address	- 3 of 4 checks passed
Inspection Legend 9 CFR § 312		- Stars missing from inspection legend		- 8 of 9 checks passed
Nutrition Facts Panel 21 CFR § 101.9, 9 CFR § 317.312, 9 CFR § 381.412	- Entire Panel: Incorrect panel type. Dual column labeling per entire package is mandatory (unless product's net contents vary or other uncommon exemptions exist) (21 CFR 101.9.b) - Serving size: Serving size is not consistent with the Reference Amount Customarily Consumed Protein: Declaration of %DV required	- Servings per container: Include the word "About" before the number of servings per container (21 CFR 101.9.b) - Serving size: Serving size unit amount is incorrectly rounded (21 CFR 101.9.b) - Metric serving size (#g) is not consistent with the OZ serving size Comments: The customary and metric amounts in the net contents differ by more than 3%. Please review your Net Content statement input and ensure the Servings Per Container are correct	- Serving size: Serving size should generally be expressed in terms of "pieces" or "slices" (whole number or fraction of) unless there is too much variance in the size of a piece or slice.	- 574 of 584 checks passed
Country of Origin 9 CFR § 327.1415				- N/A
Bioengineered Disclosure 7 CFR § 66.102(a)(2)				- Your product may not be exempt from BE Disclosure if your primary ingredient is not subject to FMIA PPIA - make sure that none of your ingredients triggers the BE regulation

Cooking Instructions			- Heating instructions are missing but strongly encouraged	- 0 of 1 checks passed		
Vignette		- "Serving Suggestion" should appear near the product vignette		- 3 of 4 checks passed		
Ad Copy				- N/A		
Precautionary Allergen Statements			These statements may only be used when good manufacturing practices and effective sanitation standard operating procedures (SSOPs) cannot reasonably eliminate the unintended presence of certain ingredients - Statement must be below ingedient Statement and font size should be same size as that of Contains	- 0 of 2 checks passed		
Other Label Elements				- N/A		
Claims & Special Statements:						
Low Fat	- Nutrient data does not support your nutrient content claim			- 8 of 9 checks passed		
Excellent Source of Protein	- Nutrient data does not support your nutrient content claim			- 5 of 6 checks passed		
All Natural	- Claim is not consistent with other label content		- Claim requires a disclaimer	- 4 of 6 checks passed		
No Preservatives				- 6 of 6 checks passed		
No MSG	- Claim is not consistent with other label content		- Claim requires a disclaimer	- 4 of 6 checks passed		
Fresh			- Claim must be substantiated with supporting documentation	- 5 of 6 checks passed		
Authentic Chinese	- Wording is not compliant		- Claim must be substantiated with supporting documentation	- 4 of 6 checks passed		
Non-BPA Lining			- Claim must be substantiated with supporting documentation	- 5 of 6 checks passed		
Grandma Alice's				- 6 of 6 checks passed		
Since 1972			- Claim must be substantiated with supporting documentation	- 5 of 6 checks passed		
Supporting Documentation:						
7234 Form	- Missing box #16: Processing Procedures are missing but required	- Formula does not include sub-listed information for "Soy Sauce" ingredient(s)		- 19 of 21 checks passed		
Prior Approval Documentation				- 1 of 1 checks passed		

Information Supplied by Client: USDA; Single Columnar / Tabular / Linear NFP; English only; RACC: 85 grams, piece(s) (\_ g); Appetizer (mini mixed dishes or dips); Mini mixed dishes (with meat or poultry); No sauce; Nutrient Claims; population: general; claims: Total Fat or Lean, Protein;

Recommendations Not Included: If you need further assistance (a consult or to upgrade to a comprehensive compliance report), please click on the "Get Expert Help" button or contact the office at labels@primelabel.com or (202) 546-3333.

Money Back Guarantee if not 100% compliant with USDA regulations



**Get Expert Help** 



# **Gold USDA Label Audit**

Project #: 01JCGB5QHR54NP46V47

11/12/24 16:20

# **Appendix 1: General Graphics and Font Guide**

Prime Label only evaluates the text size of the Net Contents statement. Any specific concerns are noted in the report, otherwise please refer to below.

#### **General Features Size Guide** – 9 CFR 317.2(b) & 9 CFR 381.116(a)

The size requirements for most label features are based on letter height. If both uppercase and lowercase letters are used, compliance is based on height of lowercase letters that do not have ascenders or descenders (e.g. "o", "e", "c"). The ratio of the letters' height to width cannot exceed 3:1.

The USDA does not have required sizing for ingredients, allergens, address line, and some other required labeling, however these features must be legible. Industry standard for legibility is at least 1/16th inches in height. Allergen font size must be the same or larger than the ingredient statement.

#### Net Contents Graphics Guide – 21 CFR 101.7 (f) & (h) and NIST Handbook 130

The size and spacing requirements for the net quantity of contents statement vary depending on the size of the product's PDP. If fractions are used, each numeral must be at least 1/2 of the minimum height required. The principles regarding lowercase letters and letter widths that apply to most label features also apply here.

# 'Buffer Zone' Around Net Quantity of Contents

The statement must be separated from other printed label information by:

- Space above and below at least equal to the height of the letter "N"
- Space to the left and right at least twice the width of the letter "N"

Area of Principa	Minimum Height for		
Greater than	the Net Quantity of Contents <sup>†</sup>		
n/a 5 square inches		1/16 inch	
5 square inches	25 square inches	1/8 inch	
25 square inches	100 square inches	3/16 inch	
100 square inches	400 square inches	1/4 inch	
400 square inches	n/a	1/2 inch	

<sup>&</sup>lt;sup>†</sup> Letter height must be increased by 1/16 inch when the declaration is blown, embossed, or molded on a glass or plastic surface.



11/12/24 16:20

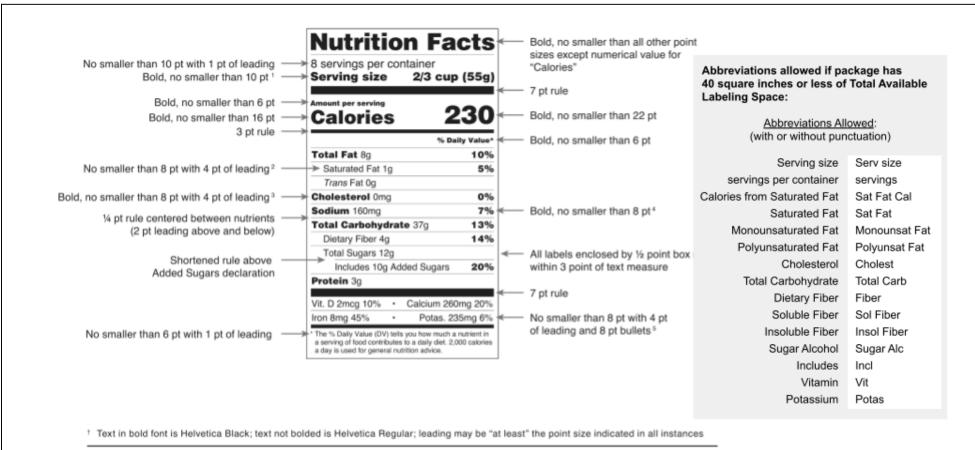


## Gold USDA Label Audit

# **Appendix 2: Nutrition Panel Graphics and Font Guide - Columnar Format**

21 CFR 101.9

Nutrition Facts format requirements are contingent on the Total Available Labeling Space (TALS) on your package. Large packages (TALS > 40 sq. in.) requirements are on the left, medium packages (TALS between 12 & 40 sq. in.) may adjust per the gray box, and small packages (TALS < 12 sq. in.) may use fonts as small as 6 point.



<sup>&</sup>quot;Serving size" declaration may be decreased to no smaller than 8 pt bold if additional space is needed for the declaration

<sup>&</sup>lt;sup>2</sup> Saturated fat, Trans Fat, Dietary Fiber, Total Sugars, Added Sugars, voluntary nutrients (if listed) and their g/mg values: No smaller than 8 pt with 4 pt of leading

Total Fat, Cholesterol, Sodium, Total Carbohydrate, and Protein: Bold, no smaller than 8 pt with 4 pt of leading

<sup>&</sup>lt;sup>4</sup> % Daily Values for nutrients that appear between 7 point rules: Bold, no smaller than 8 pt.

Vit. D, Calcium, Iron, Potas., voluntary nutrients (if listed) and their mg/mcg values and % Daily Values: No smaller than 8 pt and with 4 pt of leading



# **Nutrition Facts**

6 servings per container Serving size 1.54 oz (120g)

#### Amount per serving **Calories**

70 Dully	value
Total Fat 13g	17%
Saturated Fat 3g	15%
Trans Fat 0g	
Cholesterol 30mg	10%
Sodium 1110mg	48%
Total Carbohydrate 61g	22%
Dietary Fiber 6g	21%
Total Sugars 0g	
Includes 0g Added Sugars	0%

Protein 18a

Vitamin D 0mcg	0%
Calcium 110mg	8%
Iron 3.8mg	20%
Potassium 440mg	10%

The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

INGREDIENTS: NAPA CABBAGE LEAF. RICE, MODIFIED FOOD STARCH, SALT, SPICE SOY SAUCE, TOASTED SESAME OIL, GARLIC DRIED ONION, WATER. WRAPPER: FLOUR, WATER

DISTRIBUTED BY PRIME LABEL FOOD GROUP Washington DC 20003 www.primelabel.com

STORAGE: Once opened place unused portion in separate container and refrigerate.

NON-BPA LINING Bag lining produced without the intentional addition of BPA.



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.5"RHGL\_DATE:20DEC2021
SW\_FC\_36800\_15995\_S01

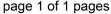












According to the Paperwork Reduction Act of 1995, an agenc collection is 0583-0092. The time required to complete this in completing and reviewing the collection of information. This for	y may not conduct or sponsor, and a person is formation collection is estimated to average 75 orm had been approved by OMB for web distrib	not required to respond to, a collection of inforr o minutes per response, including the time for re bution.	nation unless it displays a valid OMB control n viewing instructions, searching existing data s	number. The valid OMB control number for this information sources, gathering and maintaining the data needed, and  PAGE of	
U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE 1.	AGENT NAME, ADDRESS, TELEPHONE NO. (If using an Agent, complete this block, otherwise leave	2. FOR USDA USE ONLY	3. FOR USDA USE ONLY	4. ESTABLISHMENT NO. / FOREIGN COUNTRY (If applicable)	
APPLICATION FOR APPROVAL OF LABELS, MARKING OR DEVICE	blank.)				
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).	exempt from der the Freedom of			4a. TYPE OF PRODUCT  Egg Meat	
APPLICANT: See Page 5 for instructions.				Poultry Other	
5a. NAME OF PRODUCT White Meat Chicken Egg Roll			,	,	
5b. HACCP PROCESS CATEGORY (Select one)  03J: Slaughter - all species  03B: Raw Product - ground  03C: Raw Product - not ground  03D: Thermally processed - commercially steri  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  03I: Product with secondary inhibitors - not shelf  8. Does this label include a "USDA-AMS Child Nutri  10. Are there any special claims, guarantees, or fore Allergen Statements  Animal Production/Breed/Raising  Certified/Verified  Environmental/Green  Export Only Labels w/deviations from Domestic	SKETCH EXTENSION  6b. WAS THE LA  YES DA  No  elf stable  elf stable  tion Program CN-Logo?  Yes  eign language on the label?  Grading Ten  Guarantees		9. (FOR USDA-AMS USE ONL)	PLAY PANEL (Square Inches)  ING SPACE FOR ENTIRE PACKAGE (Square inches)  Y) CN Identification Number Assigned	
Foreign Language  Geographic/Undefined Style	Nutrition/Hea				
11. NAME AND ADDRESS OF FIRM (Below Prime Label Food Group	v and between dots)	12. SIGNATURE OF APPLIC Jesse Zuehlke	CANT OR AGENT	13. DATE 12-1-21	
536 7th Street SE		14. (FOR USDA USE ONLY	14. (FOR USDA USE ONLY) CONDITIONS APPLYING TO USE OF LABELS OR DEVICE		
Washington, DC 20003	_				
•	•				

15. PRODUCT FORMULA	<b>★</b> PCT WEIGHT
	(No Fractions)
Filling:	
CABBAGE	18
GROUND CHICKEN THIGHS	12
CARROTS	7
ONION	6
CELERY	5
GREEN BEANS	4
CORN CANE JUICE	3 2
BROWN RICE	
MODIFIED FOOD STARCH	1
SALT	1
SPICE	1
SOY SAUCE	1
TOASTED SESAME OIL	1
GARLIC	1
DRIED ONION	1
WATER	1
Wrapper: FLOUR	22
WATER	12

See Continuation Sheet

TOTAL (Percent must total 100%)

100

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# CONTINUATION SHEET FOR APPLICATION FOR APPROVAL OF LABELS, MARKING OR DEVICE (FSIS 7234-1)

PRODUCT NAME:

This sheet is being used for additional information required in Block(s):

## **INSTRUCTIONS FOR PREPARATION OF FSIS FORM 7234-1**

**Note:** The following instructions should be typed unless otherwise noted.

#### A. PREPARATION OF APPLICATION

Application must be typed or it will be returned without evaluation.

Submit two copies for each label application.

#### B. TYPE OF APPROVAL REQUESTED

Sketch: Self explanatory. (See 9 CFR 317.4 & 381.132)

Temporary and Extension of Temporary. Actual label or color litho take off to be used.

#### C. FOREIGN LANGUAGE

Labels printed in foreign languages must be accompanied by English language translation.

#### D. ASSEMBLY OF APPLICATION

Application Form, Product Formula, Processing Procedures, Continuation Sheet if applicable, Label, and any Supporting Documentation Staple with one or as few staples as possible. (*Do not use paper clips*).

#### E. MAIL COMPLETED APPLICATION TO:

USDA, FSIS, OPPD, LPDD Labeling Distribution Unit Stop Code 3786, Patriots Plaza III, 8-168 1400 Independence Avenue, SW Washington, DC 20250-3700

#### The following instructions relate to numbered items on form.

- If using an Agent, provide the company name, address, and telephone number, otherwise leave blank
- 2 & 3. Leave blank, for USDA use only.
- 4. Establishment No./Foreign Country (if applicable) Self Explanatory.
- 4a. Type of Product. Select one product type: Egg, Meat, Poultry, or Other (i.e. Exotic Species, Non-Amenable, Voluntary, etc.)
- 5a. Name of Product. Use common or descriptive product name, i.e., "Frankfurter, Cereal Added" or "Meat Patties in Gravy. (Do not use trade brand names or coined names, such as "Joe's Corn Dogs" or "Joe's Sloppy Joes.") If coined names such as "Corn Dogs" are used, also show true product name, such as "Batter Wrapped Wiener."
- 5b. Provide HACCP process category for the product. See 9 CFR 417.2(b) (1), Example, Heat Treated shelf stable, Not heat treated-shelf stable etc. Select one.
- 6a & b. Type of Approval Requested. If temporary approval or extension, insert number of days requested and number of labels on hand. If previous approval, attach copy of application and label. Include specific reason(s) why requesting a temporary or extension and include information required in 9 CFR 317.4(f) (1) or 381.132(f) (1) on the continuation sheet.

  Be sure to include product name and block item.
- 7a. Area of Principal Display Panel (PDP). The PDP is the entire side of the package to which the label is affixed. See 9 CFR 317.2 (d) and 381.116 (b).

- 7b. Total available labeling space in square inches for entire package.
- USDA-AMS Child Nutrition Program Logo. Indicate if the product includes a USDA-AMS Child Nutrition Program Logo.
- 9. Leave Blank. For USDA-AMS use only.
- Special claims, guarantees, or foreign language. Indicate if there are
  are any special claims, guarantees, or foreign language on the label.
   Check all that apply. If Other Claims is selected, indicate specific claim(s)
  in space provided.
- Name and Address of Firm. Insert Firm's name and mailing address. Use 2 letter symbol for State. Show postal zip code.
- 12 & 13. Signature and Date of Applicant or Agent. To be signed and dated by the applicant or agent representing the official establishment or plant.
- 14.

  Leave blank for USDA use only. Conditions Applying to Use of Label or Device. (Any condition, modification or remarks applied to the application when approved are conditions governing use of the approved devices.)
- 15. Product Formula. List the ingredients by percent or weight in order of their predominance. If product consists of several components, e.g., a frozen dinner, list each component separately and indicate the percentage or amount of each component in the product. If additional space is needed, check the box for "Continuation Sheet," and use the Continuation Sheet. Be sure to include the product name and number of the block item. Express all ingredients in the same units, i.e., do not list some in pounds and others in ounces.

Check whether weight or percent is used. It is preferred that percentages be used, and the total must equal 100 percent. If weights are used, show in pounds, kilograms or grams. (No gallons, pints, cups, teaspoons, etc.) The total must equal the weights of the individual units. (Example: Crust + Cheese + Sauce + Meat = Total new weight of unit.)

DO NOT use fractions. Express as decimals carried to two places, Example: 1-1/4 lbs., show as 1.25 lbs. Example: 3/4 lbs., show as .75 lbs.

16. Processing Procedures. Poultry Products provide complete processing procedures as required in 9 CFR 381.134. Meat Products, provide complete processing procedures as required. Note: Approval of the sketch does not convey approval of the processing procedures. If additional space is needed, check the box for "Continuation Sheet," and use the Continuation Sheet.
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According to the Paperwork Reduction Act of 1995, an a collection is 0583-0092. The time required to complete the completing and reviewing the collection of information.	gency may not conduct or sponshis information collection is estir This form had been approved by	sor, and a person is no mated to average 75 m OMB for web distribut	of required to respond to, a collection of information ninutes per response, including the time for reviewing tion.	n unless it displays a valid OMB control nung instructions, searching existing data so	umber. The valid OMB control number for this information ources, gathering and maintaining the data needed, and  PAGE of
U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE  APPLICATION FOR APPROVAL OF LABELS,  1. AGENT NAME, ADD TELEPHONE NO. (It complete this block, blank.)		(If using an Agent.		3. FOR USDA USE ONLY	4. ESTABLISHMENT NO. / FOREIGN COUNTRY (If applicable)
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.					4a. TYPE OF PRODUCT  Egg Meat  Poultry Other
5a. NAME OF PRODUCT					
5b. HACCP PROCESS CATEGORY (Select of 03J: Slaughter - all species 03B: Raw Product - ground 03C: Raw Product - not ground		SKETCH EXTENSION C	ROVAL REQUESTED TEMPORARY DF TEMPORARY	7a. AREA OF PRINCIPAL DISP	PLAY PANEL (Square Inches)
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		YES Date Prio NO Nun	EL PREVIOUSLY APPROVED?  e of approval:  or approval number:  mber of labels on hand:  mber of days requested:	7b. TOTAL AVAILABLE LABELI	NG SPACE FOR ENTIRE PACKAGE (Square inches
8. Does this label include a "USDA-AMS Child N	Nutrition Program CN-Logo	? Yes	No	9. (FOR USDA-AMS USE ONLY	/) CN Identification Number Assigned
10. Are there any special claims, guarantees, of Allergen Statements Animal Production/Breed/Raising Certified/Verified Environmental/Green Export Only Labels w/deviations from Domination Foreign Language Geographic/Undefined Style		Grading Terms Guarantees Natural/Organ Nutrition/Healt Religious Exel	nic th	ify	
11. NAME AND ADDRESS OF FIRM (B	Below and between dots)	•	12. SIGNATURE OF APPLICANT	OR AGENT	13. DATE
•		•	14. (FOR USDA USE ONLY) CO	NDITIONS APPLYING TO USE O	F LABELS OR DEVICE

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15. PRODUCT FORMULA	PCT WEIGHT (No Fractions)

See Continuation Sheet

TOTAL (Percent must total 100%)

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# CONTINUATION SHEET FOR APPLICATION FOR APPROVAL OF LABELS, MARKING OR DEVICE (FSIS 7234-1)

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- 7b. Total available labeling space in square inches for entire package.
- USDA-AMS Child Nutrition Program Logo. Indicate if the product includes a USDA-AMS Child Nutrition Program Logo.
- 9. Leave Blank. For USDA-AMS use only.
- Special claims, guarantees, or foreign language. Indicate if there are are any special claims, guarantees, or foreign language on the label.
   Check all that apply. If Other Claims is selected, indicate specific claim(s) in space provided.
- Name and Address of Firm. Insert Firm's name and mailing address. Use 2 letter symbol for State. Show postal zip code.
- 12 & 13. Signature and Date of Applicant or Agent. To be signed and dated by the applicant or agent representing the official establishment or plant.
- 14.

  Leave blank for USDA use only. Conditions Applying to Use of Label or Device. (Any condition, modification or remarks applied to the application when approved are conditions governing use of the approved devices.)
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Check whether weight or percent is used. It is preferred that percentages be used, and the total must equal 100 percent. If weights are used, show in pounds, kilograms or grams. (No gallons, pints, cups, teaspoons, etc.) The total must equal the weights of the individual units. (Example: Crust + Cheese + Sauce + Meat = Total new weight of unit.)

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