

2021


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– CONFIDENTIAL –



SAMPLE REPORT	
PRIME LABEL CONSULTANTS LABEL REVIEW	
Product Name: Spring Rolls with cabbage, chicken, onion and celery	
Company: Prime Label Consultants	Date: 01-01-21
Regulatory Consultant: Jane Smith	PLC Invoice Number: 20003
Overall Non-Compliance Risk – High –	
Overall Generic Eligibility – Eligible for Generic Approval Pending Prior LPDS Sketch Approval –	


USDA COMPLIANCE REVIEW









STATEMENT OF IDENTITY	<p><i>Non-Compliance Risk</i></p>  <p>n/a Low Moderate High</p>
	<ul style="list-style-type: none"> • Update the product name to state “white meat chicken” instead of just “chicken”. Per 9 CFR 381.117(c) the product name must identify the type of chicken if not in natural proportions of light and dark meat. • Include “carrots” within the description (e.g. “Spring Rolls with cabbage, carrots, white meat chicken, onion and celery”). Alternatively all vegetables may be grouped together as “vegetables” within the product name (e.g. “Spring Rolls with vegetables and white meat chicken”). • Recommend referencing the wrapper within the product name (e.g. “in a wrapper”, “in a crispy wrapper” or “in a spring roll wrapper”). • Establishment to ensure that the smallest letter within the product name (i.e. a lowercase “o”) is no less than 1/3 the height of the “S” in “Spring”. See the “<i>Labeling of Product Names, Fanciful Names, Word Size</i>” entry in the Food Standards and Labeling Policy Book (FSLPB).


NET QUANTITY OF CONTENTS	<p><i>Non-Compliance Risk</i></p>  <p>n/a Low Moderate High</p>
	<ul style="list-style-type: none"> • Update to “NET WET 16OZ (1 LB) 454g”. Ounces should be listed first, with pounds in parentheses, see 9 CFR 381.121(c)(5).


INSPECTION LEGEND	<p><i>Non-Compliance Risk</i></p>  <p>n/a Low Moderate High</p>
	<ul style="list-style-type: none"> • Include the USDA poultry legend, instead of the meat legend. See 9 CFR 381.96 and 381.123. A graphic example for sample purposes only has been included below. “P-42” should be replaced with the appropriate establishment number (e.g. “P-XXX”) or removed from the legend if the correct establishment number is printed elsewhere on the package. <div style="text-align: center;">  </div>


HANDLING STATEMENT	<p><i>Non-Compliance Risk</i></p>  <p>n/a Low Moderate High</p>
	<ul style="list-style-type: none"> • Include “Keep Frozen” on the front label, see 9 CFR 381.125(a). • Establishment to ensure the processing procedures support that the product is stored and distributed frozen in a frozen state.


SAFE HANDLING INSTRUCTIONS	<p><i>Non-Compliance Risk</i></p>  <p>n/a Low Moderate High</p>
	<ul style="list-style-type: none"> • Safe Handling Instructions may be required if the poultry component is not fully cooked and/or the product is not ready-to-eat, see 9 CFR 381.125(b). An example of Safe Handling Instructions is provided below: <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p style="text-align: center;">Safe Handling Instructions</p> <p>This product was prepared from inspected and passed 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.</p> <div style="display: flex; flex-direction: column; gap: 10px;"> <div style="display: flex; align-items: flex-start;">  <p>Keep refrigerated or frozen. Thaw in refrigerator or microwave.</p> </div> <div style="display: flex; align-items: flex-start;">  <p>Keep raw meat and poultry separate from other foods. Wash working surfaces (including cutting boards), utensils, and hands after touching raw meat or poultry.</p> </div> <div style="display: flex; align-items: flex-start;">  <p>Cook thoroughly.</p> </div> <div style="display: flex; align-items: flex-start;">  <p>Keep hot foods hot. Refrigerate leftovers immediately or discard.</p> </div> </div> </div>


NUTRITION FACTS PANEL	<p><i>Non-Compliance Risk</i></p>  <p>n/a Low Moderate High</p>
	<ul style="list-style-type: none"> • No recommended changes. See Graphics Format and Sizing Appendix.

INGREDIENT STATEMENT	<p><i>Non-Compliance Risk</i></p>  <p>n/a Low Moderate High</p>
	<ul style="list-style-type: none"> • Correct the spelling of “SAL” to “SALT” • Include a comma after “SALT” and before “FOOD STARCH”. • Include “WHEAT” in the allergen statement.

ADDRESS LINE	<p><i>Non-Compliance Risk</i></p>  <p>n/a Low Moderate High</p>
	<ul style="list-style-type: none"> • The Address Line must include the full street address, city, State, and ZIP code, per 9 CFR 381.122. The full street address may be omitted if it can be found in a current city directory or telephone directory.

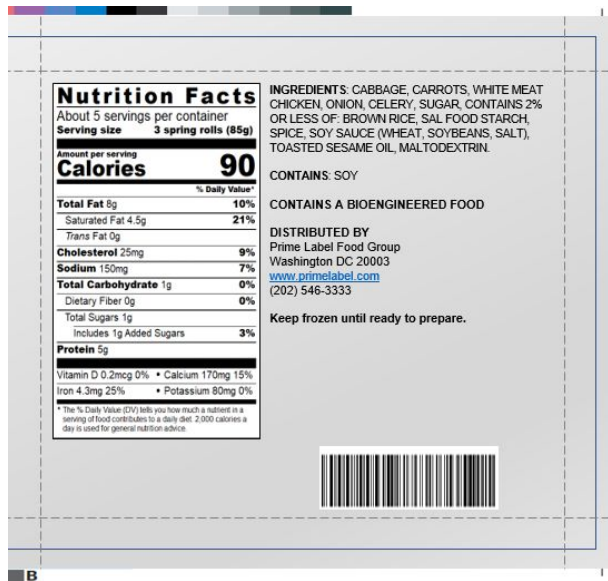
OVERALL LABEL AND LAYOUT	<p><i>Non-Compliance Risk</i></p>  <p>n/a Low Moderate High</p>
	<ul style="list-style-type: none"> • Include “Serving Suggestion” next to the illustration on the front label. See the “<i>Serving Suggestion,</i>” <i>‘Serve as Suggested,’ and Similar Phrases</i>” entry in the FSLPB. • If the egg rolls are not ready-to-eat include the following: <ul style="list-style-type: none"> ○ A statement on the front label indicating that they must be fully cooked (e.g. “Cook and Serve”, “Cook before eating” or “See Cooking Instructions”) ○ Cooking instructions that have been validated as sufficient to destroy pathogens and are reasonable for consumers to understand. • If the egg rolls are ready-to-eat, recommend including a statement such as “Fully Cooked” or “Heat and Serve”. See FSIS Directive 10240.4, Resource 1; Chart of RTE v. Not RTE Products. • Update the bioengineered disclosure to “CONTAINS A BIOENGINEERED FOOD INGREDIENT”. See 7 CFR 66.102(a)(2). • Relocate the bioengineered food disclosure <i>below</i> the name and location (“Prime Label Food Group Washington DC 20003”) and <i>above</i> the Website and Phone Number. The disclosure should be placed directly adjacent to the “name and location of the handler, distributor, packer, manufacturer, importer” per 7 CFR 66.100(d)(1).

PRODUCT CLAIMS	<p><i>Non-Compliance Risk</i></p>  <p>n/a Low Moderate High</p>
	<ul style="list-style-type: none"> • “New Flavors” - No recommended changes to the claim on the label. Establishment to ensure that the label record supports that this is a new flavor for the brand. Additionally, terms such as “New” may only be used for 6 months. See the “New and Similar Terms” entry in the FSLPB.

GENERIC ELIGIBILITY	<p><i>Non-Compliance Risk</i></p>  <p>n/a Low Moderate High</p>
	<ul style="list-style-type: none"> • The use of the 2016 FDA Nutrition Facts Panel requires that the label receive sketch approval from LPDS. If the establishment processing this product has previous approval for the use of the vertical column FDA nutrition facts panel format, this label may be eligible for generic approval.

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ARTWORK



USDA LABEL RECORD REQUIREMENTS

USDA establishments should maintain label records in accordance with 9 CFR 320.1 and 9 CFR 381.175. PLC recommends maintaining this Compliance Report 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.

APPENDIX

Applicable Graphic Format and
Sizing Appendix Included

Removed for
Sample Report Purposes Only

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