

# Essential Guide to USDA Food Labeling

*Ninth Edition*

*Version 9.9  
Revised June 2023*



Prime Label Consultants, Inc.  
536 7<sup>th</sup> Street SE  
Washington, DC 20003  
Phone 202-546-3333  
Website: <http://www.primelabel.com>

Entire contents copyright 1992, 1996, 1998, 2005, 2010-2023



# Table of Contents

Introduction .....	1
Background .....	3
Chapter 1: Regulatory Jurisdiction and Standard Labeling Features .....	5
1.1. Regulatory Jurisdictions for Food Products .....	5
1.2. Food Standards .....	6
1.3. Required Labeling Features.....	7
1.4. Key Sources of Regulatory Information .....	8
Features of USDA Food Labels .....	11
Chapter 2: Characteristics of an FSIS Food Label .....	13
2.1. Principal Display Panel and Other Panels .....	13
2.2. Foreign Languages .....	15
Chapter 3: The Product Name .....	17
3.1. Standardized Names .....	17
3.2. Descriptive Product Names .....	18
3.3. Fanciful Names .....	19
3.4. Imitation/Substitute Products .....	20
Chapter 4: Product Name Modifications .....	23
4.1. Artificial Flavors/Smoke Flavoring.....	23
4.2. Artificial Colors .....	24
4.3. Antioxidants and Preservatives.....	25
4.4. Added-Solution Statements .....	26
4.5. Binders in Poultry and Meat Products.....	30
4.6. Textured Vegetable Protein .....	31
4.7. Labeling Mechanically Tenderized Beef Products .....	32
4.8. Product Name Modifications that Resemble Qualifiers.....	34
Chapter 5: Ingredient Statement .....	35
5.1. Location of Ingredient Statement .....	35
5.2. Complex Ingredients .....	35
5.3. Composite Ingredient Statement .....	35
5.4. Ingredients at Two Percent or Less .....	36
5.5. Poultry Specific .....	36
5.6. 70/30 Rule.....	37
5.7. Flavorings and Spices.....	37
5.8. Spices and Flavorings that Impart Color.....	38
5.9. Seasonings .....	38
5.10. Corn Syrup.....	38
5.11. Animal/Vegetable Fats.....	39
5.12. Ham, Bacon and Other Cured Meats .....	39
5.13. Coatings and Rubs .....	39
5.14. "Cured with" Statements .....	39
5.15. "And/or" and "May contain" Statements.....	39
5.16. Other Ingredients Labeling.....	40

Chapter 6: Signature Line .....	41
Chapter 7: Net Weight Statement.....	43
7.1. Location .....	43
7.2. Wording.....	43
7.3. Sizing .....	44
7.4. Buffer Zone .....	44
7.5. Stuffed Poultry .....	45
7.6. Exemptions .....	45
Chapter 8: Inspection Legend .....	47
Chapter 9: Handling Statement.....	49
Chapter 10: Safe Handling Instructions .....	51
Chapter 11: Common Additional Features.....	53
11.1. Ad-copy, Romance Language, and Product Vignettes.....	53
11.2. Illustration and “Serving Suggestion” .....	53
11.3. Allergen Statements.....	54
11.4. Cooking Directions and Resource 1 Labeling.....	54
11.5. Date Codes .....	55
 Standards of Identity, Processing, and Formulation Requirements for Meat and Poultry Products.....	57
Chapter 12: Bioengineered Foods .....	59
12.1 Qualifying Products.....	59
12.2 Regulated Entities.....	60
12.3 Location .....	60
12.4 Disclosure Method .....	60
12.5 Recordkeeping.....	63
12.6 “GMO” Claims.....	63
Chapter 13: Standards of Identity for General Meat Products .....	65
13.1. Mechanically Separated Meat.....	65
13.2. Ground Beef, Chopped Beef.....	66
13.3. Hamburger .....	66
13.4. Beef Patties.....	66
13.5. Fabricated Steaks .....	67
13.6. Partially Defatted Beef Fatty Tissue (PDBFT) .....	67
13.7. Partially Defatted Pork Fatty Tissue (PDPFT) .....	67
13.8. Products Containing Blood .....	67
Chapter 14: Standards of Identity for General Poultry Products .....	69
14.1. Light and Dark Poultry Meat .....	69
14.2. Mechanically Separated Poultry .....	69
14.3. Poultry Burgers, Poultry Patties .....	70
14.4. Poultry Steaks or Filets .....	70
14.5. Poultry Tenders and Poultry Tenderloins.....	70
Chapter 15: Processing Standards for Meat and Poultry.....	71
15.1. Baked Products.....	71
15.2. Barbecue.....	71
15.3. Roast Beef Parboiled and Steam Roasted .....	72
15.4. Cooked Meat Products .....	72

15.5. Certified Pork .....	73
15.6. Irradiated Meat.....	73
15.7. Irradiation of Poultry .....	74
15.8. Moisture Protein Requirements .....	75
Chapter 16: Cured Meat and Poultry Products .....	77
16.1. Bacon.....	77
16.2. Corned Beef.....	77
16.3. Corned Beef Brisket.....	77
16.4. Corned Beef Round and Other Corned Beef Cuts .....	77
16.5. Cured Beef Tongue.....	78
16.6. Cured Pork Products.....	78
16.7. Ham Patties, Chopped Ham, Pressed Ham, Spiced Ham and Similar Products.....	79
16.8. Country Ham and Dry Cured Hams and Shoulders.....	80
16.9. Sausage.....	81
16.10. "Uncured" Products.....	86
Chapter 17: Standards of Identity for Meat and Poultry Food Products .....	87
17.1. Beans with Franks in Sauce, Sauerkraut with Wieners and Juice, and similar products.....	87
17.2. Beans with Cured Meat in Sauce.....	87
17.3. Chow Mein or Chop Suey Vegetables with Meat .....	87
17.4. Bockwurst .....	87
17.5. Chili con Carne .....	88
17.6. Chili con Carne with Beans.....	88
17.7. Hash.....	88
17.8. Corned Beef Hash .....	88
17.9. Luncheon Meats .....	89
17.10. Loaves .....	89
17.11. Meat Loaf .....	90
17.12. Meat Stews .....	90
17.13. Scrapple .....	90
17.14. Spaghetti with meat or meatballs in sauce .....	90
17.15. Spaghetti Sauce with Meat .....	91
17.16. Tamales .....	91
17.17. Tripe with Milk.....	92
17.18. Pork or Beef with Barbecue Sauce .....	92
17.19. Meat Pies .....	92
17.20. Pizzas .....	92
17.21. Margarine or Oleomargarine.....	93
17.22. Mixed Fat Shortening.....	93
17.23. Lard and Meat Fats.....	94
17.24. Lard and Leaf Lard.....	94
17.25. Rendered Animal Fat(s).....	95
17.26. Meat Extract.....	95
17.27. Fluid Extract of Meat.....	95
17.28. Deviled Ham, Deviled Tongue, etc. ....	95

17.29. Potted and Deviled Meat Food Products .....	95
17.30. Poultry, Canned Boned and Baby or Geriatric Food.....	96
17.31. Poultry Dinners and Pies .....	97
17.32. Poultry Rolls.....	97
17.33. Poultry A La Kiev .....	97
17.34. Poultry Nuggets .....	97
17.35. Uncooked, Breaded, Poultry Products.....	98
17.36. Other Poultry Dishes Defined in 9 CFR 381 .....	98
17.37. Maximum Percent Skin in Certain Poultry Products .....	100
17.38. Ham Spread, Tongue Spread, etc. ....	100
17.39. Breaded Products, Fritters .....	100
17.40. Liver Meat Food Products.....	100
17.41. Standards Other than Those Found in 9 CFR 319 .....	101
17.42. Food for Special Dietary Use .....	101
<b>Chapter 18: Food Safety and Approved Additives.....</b>	<b>103</b>
18.1. Substances Approved for Use .....	103
18.2. Undocumented Approvals of Substances.....	104
18.3. Preservatives in Product for Export .....	104
18.4. Transparent, Semitransparent, Colored and Scatterprint Packaging	105
18.5. Processing Aids/Dimethylpolysiloxan .....	105
18.6. Agar-Agar in Jellied Products .....	106
18.7. Binder Matrix in Restructured Meat Products .....	106
<b>Chapter 19: Special Labeling Statements and Product Claims .....</b>	<b>107</b>
19.1. Special Claims .....	107
19.2. Generic Claims .....	107
19.3. Geographic Terms .....	108
19.4. Grade Designations .....	110
19.5. The Term "Fresh".....	111
19.6. "All," "Pure," "100%," etc.....	112
<b>Label Approval and Inspection Requirements .....</b>	<b>114</b>
<b>Chapter 20: Label Inspection Requirements.....</b>	<b>116</b>
20.1. Overview .....	116
20.2. Record Keeping for Label Approvals .....	117
20.3. Inspection Requirements/Inspector Roles .....	119
<b>Chapter 21: USDA/FSIS Labeling Organization and Approval Structure .....</b>	<b>122</b>
21.1. Background.....	122
21.2. The Labeling and Program Delivery Staff.....	123
21.3. Label Approval Categories.....	124
21.4. Procedures for Label Approval at Labeling and Program Delivery Staff .....	127
21.5. Submission Requirements .....	131
21.6. Completing Form 7234-1 .....	133
21.7. Previous Approvals .....	141
21.8. Child Nutrition Labeling .....	141
<b>Calculating Restricted Ingredients .....</b>	<b>143</b>

Chapter 22: Calculating Restricted Ingredients.....	145
22.1. Curing Agents .....	145
22.2. Commинuted Meat Products .....	146
22.3. Pumped or Tumbled Products .....	147
22.4. Formula Showing Solution Only.....	147
22.5. Formula Showing Meat and Solution .....	148
22.6. Cure Accelerators .....	149
22.7. Sodium Phosphates.....	150
22.8. Antioxidants .....	151
22.9. Fresh Sausages and Other Fresh Products .....	152
22.10. Dried Sausages and Dried Meats .....	152
Conclusion .....	155
Appendix I: Glossary .....	159
Appendix II: Useful References.....	167
Appendix III: Documents for USDA Submission .....	171
Appendix IV: Summary of Child Nutrition (CN) Labeling Requirements .....	185
Appendix V: Worksheets and Answer Keys for Practice .....	189
Appendix VI: Sample Calculations of Product Formulas.....	223
Appendix VII: Poultry Naming Conventions .....	231



## Introduction

Over the last hundred years, as Americans shifted from growing their own food to procuring it in stores, food labels and the information they contain have become increasingly vital to maintaining trust in the nation's food supply.

For over fifty years, Prime Label Consultants (PLC) has represented food manufacturers, helping them to achieve US regulatory compliance and label approval. In so doing, PLC has seen many of the most complex and common labeling issues that inadvertently trip up manufacturers large and small, delaying or sometimes negating their labels' approved status.

PLC has written The Essential Guide to USDA Food Labeling to help industry understand and unpack the complicated and expansive regulations that govern USDA-regulated foods.

Written in common, easy to understand language, the guide provides

- A background on USDA agencies and the regulatory process
- An in-depth overview of the required features of a food label
- Details on essential standards, processing and formulation requirements
- Insight into the intricacies of USDA's approval and oversight process
- Guidance for calculations of restricted ingredients
- Appendices, worksheets and a glossary for more information

Because of the depth and complexity of USDA regulations, this guide does not cover the topic of nutrition labeling or claims. We leave that to the second volume in the series: Essential Guide to FDA/USDA Nutrition Labeling.

Several sources of information are referred to in the text. We strongly recommend that you keep them handy and look up specific entries as you go through the guide (this will help you become accustomed to regulatory language):

- Code of Federal Regulations Title 9 (Part 200 to end)
- USDA Food Standards and Labeling Policy Book
- FSIS Directives
- FSIS Policy Memoranda

See Appendix II for more information on obtaining these references.

In addition, if your company owns PLC's EZ Form® Nutrition and Label Compliance

software, we urge you to take advantage of its many reference features while reviewing this guide. You will find the program's regulations library, Form 7234-1 editor/generator, and restricted ingredients and claims calculators particularly useful.

Prime Label Consultants' goal in compiling this guide is to provide food industry professionals a comprehensive yet concise reference tool to help ensure USDA label compliance.