

# Essential Guide to USDA Food Labeling

*Ninth Edition*

*Version 9.4*

*Revised May 2018*



Prime Label Consultants, Inc.  
536 7<sup>th</sup> Street SE  
Washington, DC 20003  
Phone 202-546-3333 Fax 202-543-4337  
Website: <http://www.primelabel.com>

Entire contents copyright 1992, 1996, 1998 2005, 2010-2018



# 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 Qualifiers .....	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. Labeling Mechanically Tenderized Beef Products .....	34
4.6. Product Name Modifications that Resemble Qualifiers.....	34
Chapter 5: Ingredient Statement.....	37
5.1. Location of Ingredient Statement .....	37
5.2. Complex Ingredients .....	37
5.3. Composite Ingredient Statement .....	37
5.4. Ingredients at Two Percent or Less .....	38
5.5. Poultry Specific .....	38
5.6. 70/30 Rule.....	39
5.7. Flavorings and Spices.....	39
5.8. Spices and Flavorings that Impart Color .....	40
5.9. Seasonings .....	40
5.10. Corn Syrup.....	40
5.11. Animal/Vegetable Fats.....	41
5.12. Ham, Bacon and Other Cured Meats .....	41
5.13. Coatings and Rubs .....	41
5.14. "Cured with" Statements .....	41
5.15. "And/or" and "May contain" Statements.....	41
5.16. Other Ingredients Labeling.....	42
Chapter 6: Signature Line .....	43
Chapter 7: Net Weight Statement .....	45
7.1. Location .....	45

7.2. Wording.....	45
7.3. Sizing .....	46
7.4. Buffer Zone .....	46
7.5. Stuffed Poultry .....	47
7.6. Exemptions .....	47
Chapter 8: Inspection Legend.....	49
Chapter 9: Handling Statement.....	51
Chapter 10: Safe Handling Instructions .....	53
Chapter 11: Common Additional Features.....	55
11.1. Ad-copy, Romance Language, and Product Vignettes.....	55
11.2. Illustration and “Serving Suggestion” .....	55
11.3. Allergen Statements.....	56
11.4. Cooking Directions and Resource 1 Labeling.....	56
11.5. Date Codes .....	57
Standards of Identity, Processing, and Formulation Requirements for Meat and Poultry Products.....	59
Chapter 12: Standard Identity for General Meat Products.....	61
12.1. Mechanically Separated Meat.....	61
12.2. Ground Beef, Chopped Beef.....	62
12.3. Hamburger .....	62
12.4. Beef Patties.....	62
12.5. Fabricated Steaks .....	63
12.6. Partially Defatted Beef Fatty Tissue (PDBFT) .....	63
12.7. Partially Defatted Pork Fatty Tissue (PDPFT) .....	63
12.8. Products Containing Blood .....	63
Chapter 13: Standard Identity of General Poultry Products.....	65
13.1. Light and Dark Poultry Meat .....	65
13.2. Mechanically Separated Poultry .....	65
13.3. Poultry Burgers, Poultry Patties .....	66
13.4. Poultry Steaks or Filets .....	66
13.5. Poultry Tenders and Poultry Tenderloins.....	66
Chapter 14: Processing Standards for Meat and Poultry.....	67
14.1. Baked Products.....	67
14.2. Barbecue.....	67
14.3. Roast Beef Parboiled and Steam Roasted .....	68
14.4. Cooked Meat Products .....	68
14.5. Certified Pork .....	69
14.6. Irradiated Meat.....	69
14.7. Irradiation of Poultry .....	70
14.8. Moisture Protein Requirements .....	71
Chapter 15: Cured Meat and Poultry Products .....	73
15.1. Bacon.....	73
15.2. Corned Beef.....	73
15.3. Corned Beef Brisket.....	73
15.4. Corned Beef Round and Other Corned Beef Cuts .....	74
15.5. Cured Beef Tongue.....	74

15.6. Cured Pork Products.....	74
15.7. Ham Patties, Chopped Ham, Pressed Ham, Spiced Ham and Similar Products.....	75
15.8. Country Ham and Dry Cured Hams and Shoulders.....	76
15.9. Sausage.....	77
Chapter 16: Standards of Identity for Meat and Poultry Food Products .....	83
16.1. Beans with Franks in Sauce, Sauerkraut with Wieners and Juice, and similar products.....	83
16.2. Beans with Cured Meat in Sauce.....	83
16.3. Chow Mein or Chop Suey Vegetables with Meat .....	83
16.4. Bockwurst .....	83
16.5. Chili con Carne .....	84
16.6. Chili con Carne with Beans.....	84
16.7. Hash.....	84
16.8. Corned Beef Hash .....	84
16.9. Luncheon Meats .....	85
16.10. Loaves .....	85
16.11. Meat Loaf .....	86
16.12. Meat Stews .....	86
16.13. Scrapple.....	86
16.14. Spaghetti with meat or meatballs in sauce .....	86
16.15. Spaghetti Sauce with Meat .....	87
16.16. Tamales .....	87
16.17. Tripe with Milk.....	88
16.18. Pork or Beef with Barbecue Sauce.....	88
16.19. Meat Pies .....	88
16.20. Pizzas .....	88
16.21. Margarine or Oleomargarine.....	89
16.22. Mixed Fat Shortening.....	89
16.23. Lard and Meat Fats.....	90
16.24. Lard and Leaf Lard.....	90
16.25. Rendered Animal Fat(s).....	91
16.26. Meat Extract.....	91
16.27. Fluid Extract of Meat .....	91
16.28. Deviled Ham, Deviled Tongue, etc. ....	91
16.29. Potted and Deviled Meat Food Products .....	91
16.30. Poultry, Canned Boned and Baby or Geriatric Food.....	92
16.31. Poultry Dinners and Pies .....	93
16.32. Poultry Rolls.....	93
16.33. Poultry A La Kiev .....	93
16.34. Poultry Nuggets .....	93
16.35. Uncooked, Breaded, Poultry Products.....	94
16.36. Other Poultry Dishes Defined in 9 CFR 381 .....	94
16.37. Maximum Percent Skin in Certain Poultry Products .....	96
16.38. Ham Spread, Tongue Spread etc .....	96
16.39. Breaded Products, Fritters .....	96

16.40. Liver Meat Food Products.....	96
16.41. Standards Other than Those Found in 9 CFR 319.....	97
16.42. Food for Special Dietary Use.....	97
Chapter 17: Food Safety and Approved Additives.....	99
17.1. Substances Approved for Use.....	99
17.2. Undocumented Approvals of Substances.....	100
17.3. Preservatives in Product for Export.....	100
17.4. Transparent, Semitransparent, Colored and Scatterprint Packaging.....	101
17.5. Processing Aids/Dimethylpolysiloxan.....	101
17.6. Agar-Agar in Jellied Products.....	102
17.7. Binder Matrix in Restructured Meat Products.....	102
Chapter 18: Special Labeling Statements and Product Claims.....	103
18.1 Special Claims.....	103
18.2. Generic Claims.....	103
18.3. Geographic Terms.....	104
18.4. Grade Designations.....	106
18.5. The Term "Fresh".....	107
18.6. "All," "Pure," "100%," etc.....	108
18.7. "Organic" Designation.....	109
Label Approval and Inspection Requirements.....	111
Chapter 19: Label Inspection Requirements.....	113
Overview.....	113
19.1. Record Keeping for Label Approvals.....	114
19.2. Inspection Requirements/Inspector Roles.....	116
Chapter 20: USDA/FSIS Labeling Organization and Approval Structure.....	119
Background.....	119
20.1. The Labeling and Program Delivery Staff.....	120
20.2. Label Approval Categories.....	121
20.3. Procedures for Label Approval at Labeling and Program Delivery Staff.....	124
20.4. Submission Requirements.....	129
20.5. Completing Form 7234-1.....	131
20.6. Previous Approvals.....	139
20.7. Child Nutrition Labeling.....	139
Calculating Restricted Ingredients.....	141
Chapter 21: Calculating Restricted Ingredients.....	143
21.1. Curing Agents.....	143
21.2. Comminuted Meat Products.....	144
21.3. Pumped or Tumbled Products.....	145
21.4. Formula Showing Solution Only.....	145
21.5. Formula Showing Meat and Solution.....	146
21.6. Cure Accelerators.....	147
21.7. Sodium Phosphates.....	148
21.8. Antioxidants.....	149
21.9. Fresh Sausages and Other Fresh Products.....	150
21.10. Dried Sausages and Dried Meats.....	151

Conclusion .....	153
Appendix I: Glossary .....	157
Appendix II: Useful References.....	165
Appendix III: Documents for USDA Submission .....	169
Appendix IV: Summary of Child Nutrition (CN) Labeling Requirements .....	183
Appendix V: Worksheets and Answer Keys for Practice .....	187
Appendix VI: Sample Calculations of Product Formulas.....	221
Appendix VII: Poultry Naming Conventions .....	229





## **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 almost half that time, 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: The Essential Guide to Nutrition Labeling and Claims.

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.