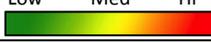


## FSIS Label Compliance Report for SHANGHAI SPRING ROLLS

Overview	
<b>Application Type:</b> <input checked="" type="checkbox"/> Generic <input checked="" type="checkbox"/> Sketch <input type="checkbox"/> Temporary	<b>Manufactured/Distributed by:</b> PLC
<b>Standardized Product:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>Contact:</b> (202) 564-3333
<b>Your PLC Food Technologist:</b> Jesse Zuehlke, PhD <span style="float: right;"><input checked="" type="checkbox"/> initial review <input type="checkbox"/> final review</span>	
<b>Label Compliance Risk:</b> <input type="checkbox"/> Low <input type="checkbox"/> Medium <input checked="" type="checkbox"/> High	

Compliance Summary
<p>This label has a <u>high risk</u> of non-compliance with published FSIS regulations and certain features defined below will require modification before your label should be used. Please correct label features according to the following suggestions and return the completed label to your PLC Food Technologist for a final review.</p>

Label Components	Non-Compliance Risk	Comments
<b>Product follows a published standard per 9 CFR &amp; FSLPB</b>	N/A 	<p><i>Spring Rolls</i> does not have a published standard of identity</p> <p>FSIS has allowed Spring Rolls as a common and usual name in the past, however this should be approved by LPDS prior to use</p>
• Product name conforms to standard	✓	
• Formula is consistent with standard	✓	
• Processing procedures are consistent with standard	✓	
• Other requirements are consistent with standard	✓	
<b>Product Name per 9 CFR 317.2 (c) &amp; 381.117</b>	N/A 	<p>Please see above</p> <p><i>Shanghai</i> implies geographic origin: state style (if documented by a 3<sup>rd</sup> party), or use <i>brand/recipe/inspired</i></p> <p><i>Chicken</i> should state <i>dark-meat</i></p> <p>TVP ingredient qualifier is required</p>
• Name follows product standard or is sufficiently descriptive instead	✓	
• Product name correctly reflects formula & processing procedures	✓	
• Product name is formatted correctly	✓	
• Product name is sized correctly	✓	
• Qualifying statements are required after product name	✓	
• Qualifiers are clearly worded & formatted correctly	✓	
<b>Net Contents per 9 CFR 317.2 (h) &amp; 381.121</b>	N/A 	<p>Dual Declaration required; state net weight in pounds as well as ounces e.g. 16OZ (1LB)</p> <p style="text-align: right;"><i>(9 CFR 317.2.h.5)</i></p>
• Size, spacing & location is correct	✓	
• Dual declarations are necessary & in correct units	✓	
• If no net contents, documentation adequate	✓	
<b>USDA Inspection Legend per 9 CFR 312.2, 317.2(i) &amp; 381.96</b>	N/A 	<p>Please refer to additional comments on page 3.</p> <p style="text-align: right;"><i>(9 CFR 381.123)</i></p>
• Correct legend, formatting & establishment # present	✓	
• Dual legends appropriate, documentation adequate	✓	
<b>Handling Statement per 9 CFR 317.2 (k) &amp; 381.125 (a)</b>	N/A 	<p>Required phrasing “KEEP FROZEN” must be used unless previously approved by LPDS.</p> <p style="text-align: right;"><i>(9 CFR 381.125.a)</i></p>
• Handling statement is appropriate for processing and HACCP	✓	
• Statement is legible with approved phrasing	✓	

Label Components (continued)	Non-Compliance Risk	Comments
<b>Safe Handling Instructions</b> per 9 CFR 317.2 (l) & 381.125 (b)	N/A	Not permitted on products with fully cooked meat / poultry
• Safe Handling consistent with processing procedures & HACCP	✓	
• Wording, format & modifications are correct & supported on label	✓	
<b>Nutrition Facts Panel</b> per 9 CFR 317.300 – 400 & 9 CFR 381.400 – 500	N/A	Please refer to additional comments on page 3.  (9 CFR 381.409)
• NFP format is appropriate for product and label size	✓	
• Serving size reflects RACC & servings per container are appropriate	✓	
• Nutrient rounding is within limits	✓	
• Abbreviations & footnote meets requirements	✓	
• Nutrient claims are adequately supported & other req'ts are met	✓	
<b>Ingredient Statement</b> per 9 CFR 317.2 (f) & 381.118	N/A	
• Order of predominance is supported by the formula	✓	
• Common or usual names are used	✓	
• Multi-ingredient components sublisted	✓	
• Purchased meat/poultry ingredients documented	✓	
• Allergen statement is formatted correctly	✓	
• Composite ingredients statement has proof of predominance	✓	
• Formula totals and includes extra ingredient information	✓	
• Ingredients that require qualifiers & restricted ingredients are OK	✓	
<b>Address (Signature) Line</b> per 9 CFR 317.2 (g) & 381.122	N/A	Address line must include the zip code  (9 CFR 381.116)
• Wording accurate	✓	
• Correct placement on the label	✓	
<b>Label Graphics &amp; Formatting</b> per 9 CFR 317.4 & 381.132 (c) (d)	N/A	The nutrition panel indicates that 10 spring rolls are included in the package yet 11 are shown in the vignette.
• Front of package is legible & contrast/type size readable	✓	
• Information panel location, elements & legibility meet regulations	✓	
• All required features are present & in correct location	✓	
• Product vignette & graphics are not misleading	✓	
• Advertising copy includes no implied claims	✓	
<b>Special Statements, Claims, &amp; Additional Features</b>	N/A	
• <b>Excellent Source of Protein</b>	✓	Requires %DV of protein in Nutrition Panel, must be ≥20%
• <b>NEW</b>	✓	OK, must remove after 6 months or apply for a temporary approval
• <b>152 Calories – Nutrient Content Statement</b>	✓	Requires LPDS review, not eligible for generic approval
• <b>Hand Rolled</b>	✓	OK, reflected in processing procedures
• <b>Check Marks used as bullets for Nutrition Claims</b>	✓	LPDS generally does not allow check marks due to the similarity to the AHA Heart Healthy Logo

## Additional Comments

### USDA INSPECTION LEGEND

- The ingredient statement indicates that there is more chicken than beef in this product; in which case the poultry establishment legend should be used rather than the meat legend.
- An open legend is acceptable provided that the establishment number is added elsewhere to this label at the time of manufacturing.

### NUTRITION FACT PANEL

- This product label contains  $\geq 3$  inches of vertical space and thus the columnar format should be used
- Calories must be rounded from 152 to 150
- The Protein line must include a %DV to support the 'excellent source' claim
- Sodium and Cholesterol rows are out of order and need to be switched
- This Serving Size is based on the undefined Appetizer RACC of 85 grams – generally OK but requires LPDS review

Please correct the indicated label features and return this report to your PLC Food Technologist for final review.

## Label Record Maintenance

Per FSIS Directive 7221.1, all approved labels must be produced upon request for authorized USDA personnel within 24 hours. Each labeling record should include:

1. a copy of the final label that is in use,
2. a record of the approval (7234 Form stamped by LPDS or, for generic, signed and dated by company representative)
3. the product formulation,
4. the processing procedure for the product, and
5. any supporting documentation needed to show that the label is consistent with the Federal meat and poultry regulations and policies on labeling as described in 9 CFR 412.1. This could include:
  - purchased ingredient spec sheets (and for purchased meat/poultry, a copy of the label)
  - unexpired certifications & claims support
  - previous label approvals
  - generic eligibility and compliance support (this report, USDA generic certificate and/or LPDS generic approval)

Updates to the formula or processing procedures, ingredient substitutions, temporary approvals, and all other updates should be included as well.

Once you have stopped producing this product, archive BUT DO NOT DELETE the label record until several years after it has been discontinued. If this label is part of a label family, you may choose to keep this record as long as the family is active.



With this report and adherence to your PLC Food Technologist recommendations for FSIS compliance, this label is entitled to two hours of Audit Defense.

This service includes two hours of phone or email support from a PLC Food Technologist in the event of FSIS enforcement activity against the reviewed label.

Please contact PLC immediately at [consult@primelabel.com](mailto:consult@primelabel.com) or (202) 546-3333 if required or for more information.

*Note that this PLC FSIS Compliance Report is specific to the documents supplied by the client at the time & the accuracy of the data is solely the responsibility of the client. As a consultant, in no event shall PLC or its employees be liable for any damages whatsoever including direct, incidental, or consequential loss of business, profit, or any special damages, even if PLC has been advised of the possibility of such damages.*

Use poultry bug for this product

Requires %DV in NFP (≥20%)

Requires LPDS approval

Only acceptable if product is made in Shanghai

Only Egg Rolls have a formal standard

State 'dark meat'

Qualify: "Textured vegetable protein added"

Add "(1 LB)"

State "Keep Frozen"

**New!**

U.S. INSPECTED AND PASSED BY DEPARTMENT OF AGRICULTURE EST.

- ✓ Excellent Source of Protein
- ✓ 152 Calories per Serving
- ✓ Hand Rolled

**Mrs. Hu's**  
**Shanghai Spring Rolls**  
*with Beef & Chicken*

NET WT. 16 OZ  
Keep them in your freezer

Amount/Serving		% Daily Value*	Amount/Serving		% Daily Value*
<b>Total Fat</b> 2g		<b>3%</b>	<b>Total Carbohydrate</b> 7g		<b>2%</b>
Saturated Fat 1g		<b>5%</b>	Dietary Fiber 4g		<b>16%</b>
<b>Sodium</b> 200mg		<b>8%</b>	Sugars 3g		
<b>Cholesterol</b> 120mg		<b>40%</b>	<b>Protein</b> 15g		
Vitamin A 0% • Vitamin C 0% • Calcium 0% • Iron 15%					

**Ingredients:** cabbage, dark-meat chicken, dried mushrooms, beef, carrots, bamboo shoots, rice paper (brown rice flour, salt, water), textured soy protein, soy sauce.

Manufactured by: PLC, Washington, D.C.

Extra roll in image

Sublist soy-sauce

Include ZIP

Round to "150"

Cholesterol should appear before sodium

Requires %DV

Label has room for vertical NFP format



**15. PRODUCT FORMULA**

**PCT**     **WEIGHT**  
 (No Fractions)

Cabbage	45%
Fully cooked chicken thigh meat	20
Dried mushrooms	10
Fully cooked shredded beef	5
Sliced carrots	5
Bamboo shoots	5
Rice Paper	5
Textured soy protein	3
Soy sauce	2

See Continuation Sheet

**TOTAL** (Percent must total 100%)

100%

**16. PROCESSING PROCEDURES** *(Approval of the sketch does not convey approval of the processing procedures)*

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Combine all ingredients except rice paper

Place 1.5OZ of mixture in center of rice paper; roll and wrap by hand

Fry to HACCP specified internal temperature

Freeze

Establishment legend applied at packaging