

10 Most Common Mistakes	And How to Avoid Them
<p>1. Either the entire label is illegible or portions of the label are illegible.</p>	<p>If the label or any portion of the label is illegible, it will be returned without being evaluated. The label application and corresponding label needs to be clear and legible in order to facilitate a proper evaluation by the Labeling and Program Delivery Technical Team. Please ensure all copies of the application form and label have print large enough to read and that there is proper contrast between the printing and background. Submissions sent in via fax machine are particularly problematic. Please ensure when faxing labels that application and label will be transmitted so all portion of the label can be read. Frequently Asked Q&A's Label Approval Process</p>
<p>2. The label is incomplete in that not all required labeling features are provided.</p>	<p>Refer to the following document for a list of all required labeling features. Some features may not be necessary; e.g., catch weight items do not require a net weight statement appear on the label before leaving the federal establishment. Checklist for Mandatory Features on a Label</p>
<p>3. The label application form is incomplete:</p> <ul style="list-style-type: none"> a. HACCP category is missing b. Available labeling space or PDP space is missing 	<p>FSIS Form 7234-1</p> <p>Be sure to complete block #5b on of the HACCP categories listed in 9 CFR 417.2(b)(1) e.g., heat-treated, not fully cooked, not shelf stable.</p> <p>Include the square inches of the principal display panel for block 7a which determines the size of the net weight statement on products sold at retail. The PDP is the entire side of the package (not just the label) to which the label is affixed. Refer to 9 CFR 317.2(d) and (h) and 381.116 (b) and 381.121. Complete block 7b with the square inches of the total available labeling space for the entire</p>

<p>c. The product formula is not presented in a manner to verify all requirements, e.g., order of predominance, restricted ingredient levels</p>	<p>package. This is needed to determine which nutrition facts format should be used on the label if the label bears a nutrition facts panel. Refer to 9 CFR 317.309(d) and 381.409 (d).</p> <p>Block #8 of the label application form should agree with the ingredients statement. Additionally, the percentage or amount of an ingredient included in a seasoning blend should indicate the percentage or weight in that seasoning or the exact amount (e.g., sodium nitrite in a cure mix or sodium phosphate in a marinade) All ingredients need to be listed in their proper order of predominance – Refer to 9 CFR 317.2(f)(1) and 381.118(a)(1).</p>
<p>4. The formulation, processing procedure, or supporting documentation do not agree with or validate information and/or claims on the label, e.g., "lemon, thyme, pepper" claim on label but the formulation does not indicate that the spices contain thyme and pepper.</p>	<p>Ensure that any information on the application form agrees with information on the label. In the example, on a label that states the product contains lemon, thyme and pepper but if the application only lists spices in the application there is no way to validate that the label claim about the spices is true. To avoid this problem, list the spices on the application form. The spices do not need to appear in the ingredients statement just necessary to validate the label claim. Refer to 9 CFR 317.2(f) and 381.118(f).</p> <p>A Guide to Federal Food Labeling Requirements for Meat and Poultry Products</p>
<p>5. Product standards are not met.</p>	<p>Please refer to the regulatory standards in both the 9 CFR 319 and 381 subpart P and the Food Standards and Labeling Policy Book</p>
<p>6. Product name is incorrect:</p> <p>a. "BBQ" on the label of a sauce with beef product, yet, standard 9 CFR</p>	<p>If the product does not meet the standard, in certain cases the product name may be</p>

<p>319.80 or 319.312 is not met</p> <p>b. Two product names that conflict, e.g. Chili and Chili with Beans</p> <p>c. Product name word size is incorrect</p>	<p>revised to include the term “flavored” or “seasoned”. Refer to the Food Standards and Labeling Policy Book for other examples.</p> <p>A product names should be consistent on the label to ensure the name will not be misleading to the end user. Food Standards and Labeling Policy Book</p> <p>Certain products have specific name sizing requirements; e.g., cured pork products in 9 CFR 319.104 and turkey ham in 381.170. Generally, the smallest letter in the product name needs to be at least 1/3 the size of the largest letter in the product name. Refer to Policy Memo 087A for additional guidance. Policy Memorandums</p>
<p>7. Ingredients statement problems:</p> <p>a. Single ingredients are not listed by common name, e.g., oil declared instead of vegetable oil, soy declared instead of soy flour, MSG declared instead of monosodium glutamate.</p> <p>b. Component ingredients are not listed by common name, e.g., cheese declared instead of imitation cheese, ham declared instead of ham water added, beef declared instead of seasoned beef and binder product.</p> <p>c. Order of predominance in the ingredients statement is incorrect.</p> <p>d. There are ingredients declared in the ingredients statement that are not in</p>	<p>A Guide to Federal Food Labeling Requirements for Meat and Poultry Products</p> <p>All ingredients need to be listed by their common or usual name not by a trade name or an abbreviation. Refer to 9 CFR 317.2(f) and 381.118.</p> <p>Ensure that all purchased ingredients are declared as they are listed on the purchased product name. On rare occasions, purchased products labels are incorrect so it is helpful if a purchased product label or an ingredient specification sheet to verify the ingredient declaration is correct. Refer to 9 CFR 317.2(f) and 381.118.</p> <p>All ingredients need to be listed in their proper order of predominance – Refer to 9 CFR 317.2(f)(1) and 381.118(a)(1).</p> <p>The product formula should agree with the ingredients statement and the ingredients statement should agree with the product</p>

<p>the formulation and vice-versa.</p> <p>e. Multi-ingredient components are missing their sub listings.</p>	<p>formula.</p> <p>Refer to 9 CFR 317.2(f)(1) and 381.118(a)(1).</p>
<p>8. Nutrition facts problems:</p> <p>a. The servings per container are incorrect.</p> <p>b. The serving size is incorrect.</p> <p>c. The wrong format is used.</p> <p>d. Improper rounding of the values.</p> <p>e. Improper reference amounts are used.</p>	<p>Nutrition Labeling Information</p> <p>Refer to 9 CFR 317.309(b) and 381.409(b)</p> <p>Refer to 9 CFR 317.309(b) and 381.409(b)</p> <p>Refer to 9 CFR 317.309(b) and 381.409(b)</p> <p>Refer to 9 CFR 317.309(b) and 381.409(b) The rounding rules for each nutrient (vitamin and minerals are listed collectively) are listed individually in each nutrient citation.</p> <p>Refer to 9 CFR 317.312 and 381.412. Be sure to make sure the product category is used to determine the proper reference amount. Whether the product is ready to serve or ready to cook is also important in determining which gram weight to use as the reference amount. If there is not reference amount for particular product refer to 9 CFR 317.312 (c).</p>
<p>9. Nutrient content claims are incomplete or do not comply with regulatory requirements, e.g., reference statement and quantitative information of comparative claims.</p>	<p>Refer to 9 CFR 317 313-317, 363 and 381.413-381.463</p> <p>The Labeling of Factual Statements on Nutrients in Meat and Poultry Products</p>
<p>10. Undefined nutrient content claims are used, e.g., leaner, low carbohydrate, very low in fat.</p>	<p>The regulations are very prescriptive for nutrient content claim; if the claim is not defined in the regulations then it cannot be used on the label. 9 CFR 317</p>