

Labeling Your “Equal To” Meat and Poultry Products

Equal to Meat & Poultry Program



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INTRODUCTION

Labels for meat and poultry products must meet certain requirements to ensure consumers are aware of the ingredients, weights, and other components of the products they are purchasing. These requirements are established by federal and state laws and regulations and are an essential part of ensuring food safety. This document offers guidance and resources for Minnesota Equal To (E2) establishments on creating labels for meat and poultry products in compliance with the requirements.

KEY TERMS

- **Equal To (E2):** Establishments and the inspection program personnel operating under the MN Equal To USDA inspection program (i.e., operating “equal to” USDA regulations)
- **Principal Display Panel (PDP):** The portion of a product label most likely to be seen by the consumer at the time of purchase, usually on the front of the package
- **Information Panel (IP):** A secondary product label which may contain some but not all a product’s required label features
- **Standard of Identity:** Requirements set by federal regulations describing what a food product must contain in order to be marketed under a certain name in allowable commerce
- **Single Ingredient:** Naturally occurring substances, with nothing added (e.g., whole cuts of raw meat, steaks, roasts, whole poultry, ground beef)
- **Co-Packing/Private Labeling:** An E2 establishment manufacturing a product for a customer and then packaging it under the customer’s name
- **Multi-Ingredient Formulated Product:** Manufactured products composed of more than one ingredient
- **Compound Ingredient:** A product used in a multi-ingredient formulated product that contains multiple ingredients (e.g., the cheese used in a cheddar brat)
- **In-Plant Label Review:** The process of producing labels or modifications to labels without submittal to the Minnesota Department of Agriculture (MDA) for review
- **MDA Label Review:** The process of submitting labels to the MDA to review and accept before those labels are used
- **Inspector in Charge (IIC):** The state inspector assigned to an establishment
- **Label Review Officer:** A food standards compliance officer; enforcement, investigations, and analysis officer (EIAO); or other designee with specific responsibilities for label review
- **Establishment Single Ingredient Label Submission Form:** The official form that must be completed by an establishment and submitted for MDA label review of a single ingredient product label
- **Establishment Multi-Ingredient Label Submission Form:** The official form that must be completed by an establishment and submitted for MDA label review of a multi-ingredient formulated product label
- **Inspector Label Submission Checklist:** A cover sheet for label submission materials, completed by the IIC
- **Label Review Package:** The documents that must be included in an MDA label submission, including but not limited to an Establishment Label Submission Form, an Inspector Label Submission Checklist, and any required supporting documents
- **Label Review Officer Worksheet:** The receipt declaring whether a label is acceptable or unacceptable and providing feedback to the establishment on the label content

OVERVIEW OF LABELING REQUIREMENTS

Who is responsible for the labeling of meat and poultry products?

Establishments are fully responsible for their labels. The review process is intended to provide feedback to establishments and ensure that regulatory requirements are being met; however, this process does not guarantee labels will always be fully in compliance. While inspectors, label review officers, clients, and suppliers may all play a role in designing or reviewing product labels, ultimately, **the establishment labeling the products is fully responsible for the design and content of those labels.**

Why is it important to label meat and poultry products correctly?

Properly labeled meat and poultry products protect consumers from misbranded and adulterated products. Declaring all ingredients used to formulate a meat or poultry product in the ingredients statement ensures full disclosure to the consumer of any ingredients that may cause adverse conditions, such as allergic reactions. Failure to properly label meat and poultry products may result in a recall and/or may place the establishment in legal jeopardy.

Basic label requirements

The following table lists the information required on labels for all **Equal To (E2)** meat and poultry products (unless otherwise noted) and the required location on the label for that information. A single label on the front of a package may be used to display all required information. This is known as the **principal display panel (PDP)**. Alternatively, the required information may be divided into two labels, the PDP and a separate **information panel (IP)**. Certain information may also be displayed apart from both the PDP and the IP.

INFORMATION		LABEL LOCATION (PDP OR IP)
1.	Product Name	PDP
2.	State Inspection Legend	PDP
3.	Net Weight	PDP
4.	Handling/Perishability Statement	PDP
5.	Name and Address	PDP or IP
6.	Ingredients Statement (if required)	PDP or IP
7.	Safe Handling Instructions	PDP, IP, or anywhere else
8.	Nutrition Facts Panel (optional)	PDP or IP



REQUIRED LABELING INFORMATION

1. Product Name

Regulatory reference: 9 CFR § 317.2(c) (meat); 9 CFR § 381.117 (poultry)

The product name must be accurate. If a non-standard or fanciful name is used, a product description must be provided. If the product name invokes a **standard of identity**, it must be shown through the formulation and processing procedures that the standard has been met. More information on standards of identity can be found in the USDA's "Food Standards and Labeling Policy Book" and in 9 CFR § 319 (for meat) and 9 CFR § 381 Subpart P (for poultry).

Single ingredient meat cut identity standards can be found in the "Uniform Retail Meat Identity Standards (URMIS)," published and distributed by the National Livestock and Meat Board, and "The Meat Buyers Guide," published by the National Association of Meat Purveyors. These resources have been prepared and reviewed in cooperation with the U.S. Department of Agriculture/Agricultural Marketing Service, as well as public and industry associations. They can be used to identify recommended names for red meat cuts as they have been created to reduce consumer confusion from lack of uniformity in names of meat cuts and standards for labeling those products.

2. State Inspection Legend

Regulatory reference: 9 CFR § 312 (meat); 9 CFR § 381.96 (poultry)

Wholesaled products (sold to someone who intends to resell) must bear the state inspection legend. The legend must include the official establishment number. The legend may be placed on the main label or on a separate sticker.

3. Net Weight

Regulatory reference: 9 CFR § 317.2(h) (meat); 9 CFR § 381.121 (poultry)

The net weight is required on products sold at retail unless net weight is applied at retail. It should appear on the lower third of a label's PDP. Products between one and four pounds may need a dual declaration (weight in ounces as well as pounds and ounces).

4. Handling/Perishability Statement

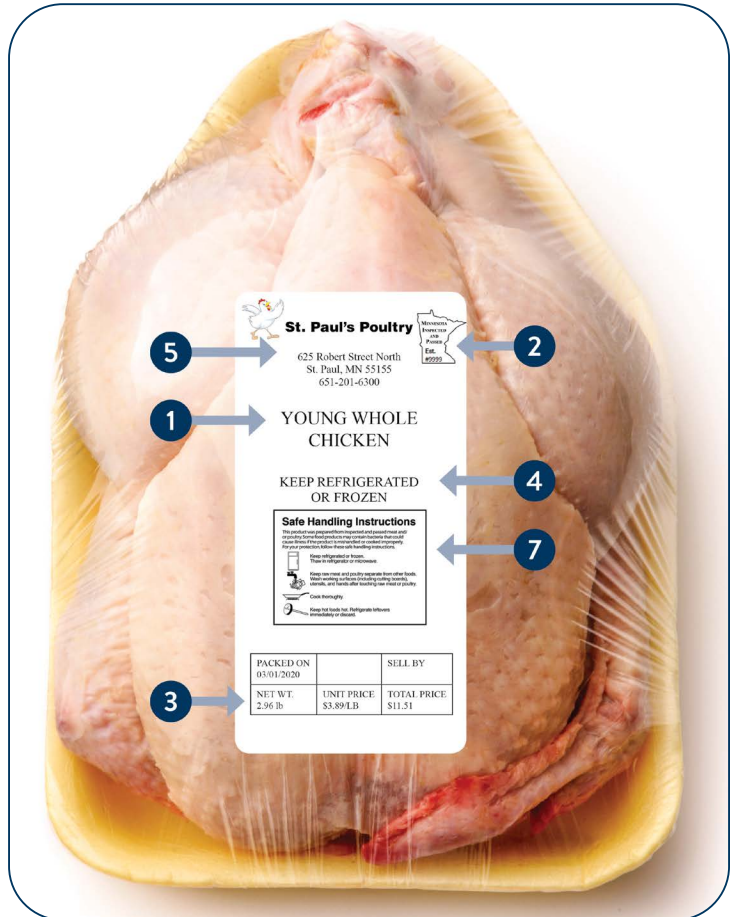
Regulatory reference: 9 CFR § 317.2(k) (meat); 9 CFR § 381.125(a) (poultry)

The statement "Keep Refrigerated" or "Keep Frozen" must be on all products that are not shelf stable. If the statement appears on a shelf-stable product, it must be handled accordingly.

5. Name and Address

Regulatory reference: 9 CFR § 317.2(c)(3) & (g) (meat); 9 CFR § 381.122 (poultry)

The label must display the name and address of the establishment, including zip code. The street address must be provided unless the establishment's address can be found in a phone book or online directory. When products are **co-packed**, the company's name and address may be used with a qualifying statement such as "manufactured for..." or "distributed by..."



6. Ingredients Statement

Regulatory reference: 9 CFR § 317.2 (meat); 9 CFR § 381.118 (poultry)

For any **multi-ingredient formulated product**, the label must contain the word “ingredients” followed by a list of the ingredients in descending order by predominance of weight. (The ingredient weighing the most is listed first, and the ingredient weighing the least is listed last.) Identify ingredients by their common names rather than brand or trade names.

Restricted Ingredients

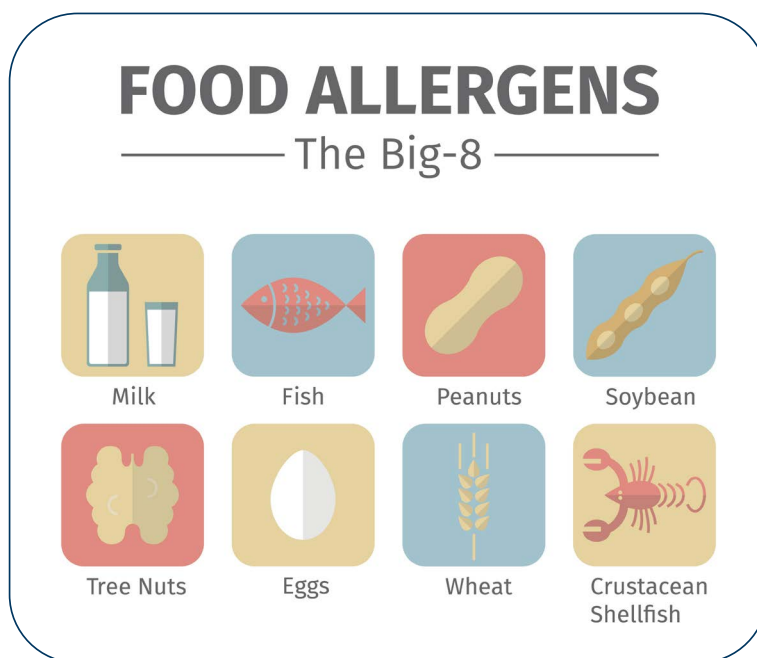
Certain ingredients, such as preservatives and cure accelerators, have maximum allowable limits in meat and poultry products. Inspectors, ingredient suppliers, and the USDA’s “Processing Inspectors’ Calculations Handbook” can all help verify if a product ingredient formulation falls within legal limits for restricted ingredients.

Allergens

Allergen labeling is required if any of the eight major allergens is part of the product formulation and is not listed by its common or usual name in the ingredient list. After the ingredients statement, place the word “contains” followed by the common name of the food allergen. Note that tree nuts must be listed by the specific type – it is not adequate to list simply “nuts” or “tree nuts” (e.g., Contains: Wheat, Milk, Cashews).

Compound Ingredients

Within the ingredient statement, any **compound ingredients**, such as a spice blend or cheese, must have their original ingredient statements carried over directly from their source packaging. These ingredient statements should be listed parenthetically after the name of the compound ingredient.



In this example below, the meat product contains both single and compound ingredients. Note how the ingredients in the cheddar cheese are listed parenthetically within the summer sausage ingredient statement.



Exceptions

Ingredients do not need to be listed in descending order by predominance of weight if they represent 2% or less of the volume/weight of the whole product **and** are listed after a quantifying statement such as “Contains 2% or less of...” or “Less than 1.5% of...”

7. Safe Handling Instructions

Regulatory reference: 9 CFR § 317.2(l) (meat); 9 CFR § 381.125(b) (poultry)

Safe handling instructions are required on raw and partially cooked meat and poultry products sold to household consumers, hotels, restaurants, or similar institutions. This includes products that have been cut, sliced, trimmed or otherwise processed or repackaged by retailers. The following safe handling instructions, in print no smaller than one-sixteenth of an inch, must be prominently displayed:

8. Nutrition Facts Panel

In most cases, Minnesota E2 establishments are not required to provide nutrition facts on product labels. Labeling that includes a nutrition facts panel is only required for products that are not exempted by 9 CFR § 317.400 (for meat) or 9 CFR § 381.500 (for poultry). However, establishments must keep in mind that even if nutritional labeling is not technically required on their labels, businesses buying their products may expect it.

Safe Handling Instructions

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.



Keep refrigerated or frozen.
Thaw in refrigerator or microwave.



Keep raw meat and poultry separate from other foods.
Wash working surfaces (including cutting boards), utensils, and hands after touching raw meat or poultry.



Cook thoroughly.



Keep hot foods hot. Refrigerate leftovers immediately or discard.

LABEL REVIEW

Overview

Product labels for E2 establishments are reviewed using one of two distinct processes: **In-plant label review** or **MDA label review**. The MDA label review is the more extensive of the two processes and is used for any of the following:

1. Labels for religious-exempt products (9 CFR § 412.1 (c) (1));
2. Labels for temporary use (9 CFR § 412.1 (c) (4));
3. Labels with special statements and claims (9 CFR § 412.1 (c) (3));
4. All labels for new E2 establishments; and
5. All labels for products produced under new HACCP plans, in existing E2 establishments.

Product labels that do not fall within one of these categories are reviewed through a simpler, in-plant label assessment by the **inspector in charge (IIC)**.

In-Plant Label Review

This label review process is allowed for any labels that do not fall within one of the categories identified in 9 CFR § 412.1 (listed above). This can include fully cooked products, multi-ingredient products, and cured products. The in-plant review process can be completed by the IIC at the establishment. This can be done either as a specific task assigned to the inspector by the MDA or as an unscheduled inspection task performed at the discretion of the inspector.

In-plant label review is not available to any establishment operating under the E2 designation for the first time or to existing E2 establishments developing labels under a new HACCP category.

MDA Label Review

This label review process involves submitting labels electronically, along with forms and supporting documentation, to the MDA for review. This is required for all labels that fall within one of the categories identified in 9 CFR § 412.1 and described below.

Labels for Religious-Exempt Products

Religious-exempt products do not receive the mark of inspection and therefore deviate from the general labeling requirements for meat and poultry products. This applies only to poultry slaughtered under Buddhist, Confucian, Halal, or Kosher religious exemptions. Labels for ritually slaughtered meat that receives the mark of inspection, including Kosher or Halal, may undergo in-plant label review if they do not meet any of the other labeling categories requiring submittal to the MDA.

Labels for Temporary Use

Temporary labels are used to correct a label error or adjust minor issues on a label on a short-term basis, often only until new labels can be produced. A temporary label may be declared acceptable for use for up to 180 days on a case-by-case basis if the regulatory issue does not pose any potential health or safety problem to the consumer. For example, if an establishment discovered one of its labels was missing a net weight and decided to apply a separate sticker with the missing information, both the original label and the modified sticker would need to be submitted for review prior to use.

Labels with Special Statements and Claims

Labels with claims, logos, trademarks, and other symbols that are generally not defined in federal regulations must be submitted for review. Examples include animal production claims (e.g., no added antibiotics, locally raised), breed claims (e.g., angus), negative or free claims (e.g., no additives, no alcohol, no animal by-products), nutrition factual statements (e.g., 0 grams of carbohydrates per serving), organic claims, and many more.

Labels that contain claims of this nature must be submitted for review; they will not be accepted unless proper documentation is provided to support the statements or claims. See Appendix A for an expanded list of examples of statements and claims that must be reviewed by the MDA prior to use on a label.

Factual Statements and Claims That Do Not Require Submittal for Review

The MDA does not consider certain factual statements applied to labels to be special statements or claims requiring submittal for review **if** the label complies with all regulatory requirements and the statement or claim is truthful and not misleading. Labels that contain these factual statements may undergo in-plant review. Supporting documentation for the statement or claim must still be a part of the labeling record. Examples of such statements or claims include:

- Statements about how the product was processed such as “Handcrafted” or “Air Chilled”
- Awards and Promotions
- Statements that begin with “Made by...” or “Made with...” followed by an objective description such as “Made with Minnesota wild rice”

See Appendix B for an expanded list of examples of statements and claims that do not require submittal.

Labels for New E2 Establishments

A new E2 establishment must submit **all** labels to the MDA for review prior to producing any products under inspection. This is regardless of whether those products fall within any of the three categories listed above. New establishments may wish to limit their starting line of products in order to reduce the amount of label review paperwork required before beginning production under inspection.

Labels for Products in New HACCP Plans, in Existing E2 Establishments

Existing E2 establishments developing a new HACCP category must also submit all labels for review prior to producing the products under inspection in the new HACCP category. These labels will be reviewed by the corresponding **label review officer** assigned to review the establishment’s HACCP plans. The submittal of these labels follows the process described in the next section.

LABEL SUBMITTAL PROCESS


Establishments are responsible for ensuring that labels needing MDA review are appropriately submitted. This section outlines the process that establishments must use to submit their labels; it is important to understand and follow these steps to allow labels to move through the review process efficiently.

Step 1: Complete Appropriate Label Submission Forms

Establishments must use official label submission forms when submitting labels for review. The **Establishment Single Ingredient Label Submission Form** is used for single ingredient products, and the **Establishment Multi-Ingredient Label Submission Form** is used for multi-ingredient products. These forms are supplied by the IIC or requested by emailing MDA.MeatPoultryEgg@state.mn.us. Establishments are responsible for completing these forms; the IIC may assist if requested. If an establishment co-packs, that establishment is still responsible for completing the forms and submitting the labels on behalf of the producer.

Establishment Single Ingredient Label Submission Form

1. **Establishment Name:** Record the establishment producing the product identified in this label.
2. **Establishment Number:** Record the official establishment number assigned by the MDA.
3. **Co-Packed For:** If the name of the producing establishment is not listed on the label, record the name of the company under which the products are sold.
4. **Inspector:** Record the first and last name of the IIC.
5. **Product Name:** Record the name of the product as it is listed on your label.
6. **Attach Label Here:** Attach an example label from one product to the form to serve as a template for review. A listing of all products being produced under this ingredient label must be attached to the form.
7. **Type of Product:** Select one product category.
8. Select the appropriate response to indicate the presence/absence of each listed feature on the label, or to indicate if the materials are included as part of the submission.

 DEPARTMENT OF AGRICULTURE		625 Robert Street North, Saint Paul, MN 55155-2538 www.mda.state.mn.us	
Dairy and Meat Inspection Division Phone: 651-201-6300 Email: MDA.MeatPoultryEgg@state.mn.us			
Establishment Single Ingredient Label Submission Form			
<p>The Minnesota Department of Agriculture (MDA), pursuant to Minnesota Statutes 31A, requires new meat plants and existing meat plants making a new product to submit copies of certain product labels to ensure the labels comply with state and federal labeling regulations.</p> <p>Requirements for claiming trade secret protection: Trade secret information (as defined in Minn. Stat. § 13.37) is classified as not public data. Determining what constitutes trade secret information is ultimately the legal responsibility of the MDA. In the event there is a question as to whether data submitted per this form meets the legal definition of trade secret information, the party submitting the data may be asked by the MDA to 1) identify the specific formula, pattern, compilation, program, device, method, technique, or process that the applicant believes to be valid trade secret information; and 2) provide sufficient justification that the data in question meet the definition of trade secret information within § 13.37. If the MDA determines that the data do not meet the definition of trade secret information, the data will be available to the public unless the applicant secures a court order saying otherwise.</p> <p>St. Paul Office Use Only: Label ID# _____</p>			
Establishment Name:		Establishment Number:	
Co-Packed for (if applicable):		Inspector:	
Product Name:			
Attach Label Here – Use additional forms if more space is needed or if more than one label is submitted. Also provide a list of all products that will be produced under this label.		Type of Product	<input type="checkbox"/> Raw intact <input type="checkbox"/> Raw not intact
		Company Name	<input type="checkbox"/> Yes <input type="checkbox"/> No
		Address	<input type="checkbox"/> Yes <input type="checkbox"/> No
		Zip Code	<input type="checkbox"/> Yes <input type="checkbox"/> No
		Handling Statement Which one is used?	<input type="checkbox"/> Keep Refrigerated <input type="checkbox"/> Keep Frozen
		Safe Handling Statement Is it required and present?	<input type="checkbox"/> Yes <input type="checkbox"/> No
		State Inspection Legend Is it present on front of package with establishment number legible?	<input type="checkbox"/> Yes <input type="checkbox"/> No
		Net Weight Statement Is it present and located within bottom 1/3 of label?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Claims Are special statements/ claims made, and is supporting documentation attached?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
This form must be retained with the establishment's records. Only reviewed labels may be used for inspected product.			
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Establishment Multi-Ingredient Label Submission Form

Items 1 through 8: refer to Single Ingredient Label Submission Form on the previous page

9. **Standard of Identity:** Review 9 CFR § 319 or the USDA “Food Standards and Labeling Policy Book” to determine if the product name invokes a standard of identity.
10. **Ingredient Name:** Record ingredients in order of predominance by weight in pounds. To do this, begin with the actual formula you use for your product. Then convert measurements to pounds if necessary (i.e., divide ounces by 16, weigh volumetric measurements). For an example, see Appendix C.
11. **Weight (lbs.):** Record the weight in pounds of each ingredient.
12. **Type of Component:** Indicate whether each component is a single ingredient or a compound ingredient. For compound ingredient components, attach copies of ingredient labels and then select “Yes” under “Ingredient List Attached”.
13. **Common/Descriptive Product Name:** Describe the product in common terms (e.g., beef sausage).
14. **Fanciful Name:** This is a name that is commonly used and understood by the public but does not describe the nature of the meat (e.g., breakfast patties). A descriptive term must accompany the fanciful name so as not to mislead the consumer.
15. **Species:** State what type of animal meat is in this product.

m DEPARTMENT OF AGRICULTURE		625 Robert Street North, Saint Paul, MN 55155-2538 www.mda.state.mn.us					
Dairy and Meat Inspection Division		Phone: 651-201-6300	Email: MDA.MeatPoultryEgg@state.mn.us				
Establishment Multi-Ingredient Label Submission Form							
<small>The Minnesota Department of Agriculture (MDA), pursuant to Minnesota Statutes 31A, requires new meat plants and existing meat plants making a new product to submit copies of certain product labels to ensure the labels comply with state and federal labeling regulations.</small>							
<small>Requirements for claiming trade secret protection: Trade secret information (as defined in Minn. Stat. § 13.37) is classified as not public data. Determining what constitutes trade secret information is ultimately the legal responsibility of the MDA. In the event there is a question as to whether data submitted per this form meets the legal definition of trade secret information, the party submitting the data may be asked by the MDA to 1) identify the specific formula, pattern, compilation, program, device, method, technique, or process that the applicant believes to be valid trade secret information; and 2) provide sufficient justification that the data in question meet the definition of trade secret information within § 13.37. If the MDA determines that the data do not meet the definition of trade secret information, the data will be available to the public unless the applicant secures a court order saying otherwise.</small>							
<small>St. Paul Office Use Only: Label ID# _____</small>							
Establishment Name:		Establishment Number:					
Co-Packed for (if applicable):		Inspector:					
Product Name:		9					
Product name has a standard of identity per 9 CFR 319 or USDA Food Standards and Labeling Policy Book <input type="checkbox"/> Yes <input type="checkbox"/> No							
Ingredient Name List all ingredients of product formula in order of predominance	Weight (lbs.) No volumetric measurements	Type of Component Check appropriate box for each ingredient	12				
				Single Ingredient (e.g. black pepper)	Compound Ingredient Contains multiple ingredients (e.g. cheese), and a copy or photo of the ingredient statement, listing all sub-ingredients, is attached		
						Ingredient List Attached	
							<input type="checkbox"/> Yes <input type="checkbox"/> No
							<input type="checkbox"/> Yes <input type="checkbox"/> No
							<input type="checkbox"/> Yes <input type="checkbox"/> No
							<input type="checkbox"/> Yes <input type="checkbox"/> No
							<input type="checkbox"/> Yes <input type="checkbox"/> No
							<input type="checkbox"/> Yes <input type="checkbox"/> No
							<input type="checkbox"/> Yes <input type="checkbox"/> No
							<input type="checkbox"/> Yes <input type="checkbox"/> No
							<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Yes <input type="checkbox"/> No							

This form must be retained with the establishment's records. Only reviewed labels may be used for inspected product.

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Establishment Name:	13	Establishment Number:	14
Common/Descriptive Product Name:	15	Fanciful Name (if used):	
Attach Label Here – Use additional forms if more space is needed or if more than one label is submitted. Provide a list of all products that will be produced under this label.		Species:	
Type of Product		<input type="checkbox"/> Raw intact <input type="checkbox"/> Raw not intact <input type="checkbox"/> Heat treated, shelf stable (SS) <input type="checkbox"/> Fully cooked (FC), not SS <input type="checkbox"/> Heat treated, not FC, not SS <input type="checkbox"/> Other:	
Restricted Ingredients		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Ingredient Statement		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Company Name		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Address		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Zip Code		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Handling Statement Which one is used?		<input type="checkbox"/> Keep Refrigerated <input type="checkbox"/> Keep Frozen	
Safe Handling Statement Is it required and present?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
State Inspection Legend Is it present on front of package with establishment number legible?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Net Weight Statement Is it present and located within bottom 1/3 of label?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Nutritional Labeling Is it required and present?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Casing Information		<input type="checkbox"/> None <input type="checkbox"/> Collagen or Artificial <input type="checkbox"/> Natural - Species:	
Claims Are special statements/ claims made, and is supporting documentation attached?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
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Establishment Multi-Ingredient Label Submission Form (Continued)

16. **Nitrite Calculation:** Review the USDA “Processing Inspectors’ Calculations Handbook” to determine the appropriate calculations and record those in this box.
17. **Cure Method:** Select the cure method(s) used.
18. **Cure Accelerator and/or Phosphate Calculation:** Review the USDA “Processing Inspectors’ Calculations Handbook” to determine the appropriate calculations and record those in this box.
19. **Processing Notes:** Identify the HACCP plan under which the product is produced and indicate specific processing steps (e.g., tumbling, dry rub, brining). The establishment should work with the IIC to determine if any of the following information is also required: total batch weight, projected finished weight, actual finished weight, final internal temperature, % shrink expected, % shrink measure, % non-meat protein.

Calculation and Preparation Methods	
<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> Nitrite Calculation Check method and record calculations </div> <div style="text-align: center; height: 150px; font-size: 48px; font-weight: bold; color: white; background-color: #003366; border-radius: 50%; margin: 0 auto; width: 60px;">16</div>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> Cure Method (check all that apply) </div> <div style="display: flex; flex-direction: column; gap: 10px;"> <div><input type="checkbox"/> Whole muscle cure</div> <div><input type="checkbox"/> Pumped _____ %</div> <div><input type="checkbox"/> Massaged</div> <div><input type="checkbox"/> Immersion</div> <div><input type="checkbox"/> Dry Rub</div> <div><input type="checkbox"/> Other:</div> </div> <div style="text-align: center; height: 150px; font-size: 48px; font-weight: bold; color: white; background-color: #003366; border-radius: 50%; margin: 0 auto; width: 60px;">17</div>
<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> Cure Accelerator (Ascorbic acid, erythorbic acid, sodium ascorbate, sodium erythorbate (isoascorbate), citric acid, or sodium citrate), and/or Phosphate Calculation </div> <div style="text-align: center; height: 150px; font-size: 48px; font-weight: bold; color: white; background-color: #003366; border-radius: 50%; margin: 0 auto; width: 60px;">18</div>	
<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> Processing Notes This may include but is not limited to preparation method, water activity, moisture-protein ratio, shrink percentage, or any other relevant calculations </div> <div style="text-align: center; height: 150px; font-size: 48px; font-weight: bold; color: white; background-color: #003366; border-radius: 50%; margin: 0 auto; width: 60px;">19</div>	

In accordance with the Americans with Disabilities Act, this information is available in alternative forms of communication upon request by calling 651-201-6000. TTY users can call the Minnesota Relay Service at 711. The MDA is an equal opportunity employer and provider.

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Step 2: Gather Supporting Documentation

As directed on the label submission forms, collect any necessary supporting documentation to include when submitting a label for review. This may include the following:

- Ingredient statements for compound ingredients used in product formulation
- Raising claims affidavits, organic certifications for products, laboratory testing results for claims on special ingredients, etc. (if using special statements or claims on a label)
- Letters from spice manufacturers verifying ingredients
- Laboratory analysis for nutrition facts, if provided on the label
- Any in-house or laboratory chemical composition analyses (Aw, pH, MPR) used to support product names or categories

Step 3: Submit Label Review Package

When an establishment is ready to submit a label for review, the IIC must complete and sign an **Inspector Label Submission Checklist** that will serve as a cover sheet for the submission materials, verifying that the label review package is complete. A complete **label review package** will include the following:

- Inspector Label Submission Checklist (completed and signed by the IIC) for each label
- Establishment label submission forms (completed by the establishment, with labels attached); Include a single or multi-ingredient form for each product label being reviewed
- Supporting documentation

Before submitting materials for review, make sure all required fields on label submission forms are legibly completed, and verify inclusion of all the necessary documentation for claims and ingredients.

A completed label review package should be submitted electronically by the establishment or the IIC to MDA.MeatPoultryEgg@state.mn.us. The MDA will not accept submissions from any individual or entity other than establishment representatives or inspection personnel.

Common Mistakes and How to Avoid Them

Label reviews are often delayed because establishments do not submit complete information or fail to use the designated process. Submitting labels with all the required information and in the proper format will help ensure a timely review process. The following table contains a list of common mistakes and how to avoid them.

MISTAKES	HOW TO FIX THIS
Label is illegible or portions of it are illegible	Ensure that you submit your label forms and documentation via email and that all files and/or photos are legible; faxed copies will not be accepted as they are usually not legible.
Failing to provide supporting documentation for claims made on the label	Submit supporting documentation for every claim you make; for example, if you make a grass-fed claim on your product, an affidavit from the producer is required.
Failing to declare allergens on the label	Ensure the Big 8 allergens are appropriately called out on your product label – this is key, as many recalls of meat and poultry are related to the failure to properly label for allergens (review the allergens section on page 6).
Documentation is incomplete	Use the label review checklist to ensure that you have submitted all required documentation.
Submitting multiple copies of the same label through a variety of delivery modes or sending the same inquiry to multiple staff members	All labels must be submitted through the MDA.MeatPoultryEgg@state.mn.us email inbox. This ensures a method of tracking the label review and allows an accurate, timely label review process.

MISTAKES	HOW TO FIX THIS
No casing information was listed on the forms	Casing information must be disclosed on the label and submission form to verify species and/or casing material on all products that use casing.
Missing calculations for restricted ingredients	Disclosing calculation of restricted ingredients ensures the proper amount of those ingredients; be sure the calculations section(s) are complete on the multi-ingredient label submission form for products that contain restricted ingredients.
Failing to provide copies or pictures of ingredient statements of compound ingredients used in the product formula	Showing the original ingredients or component ingredients used ensures that all ingredients are disclosed on the label, including allergens.

Receiving Your Label Review Results

Typically, there is about a 30-day turnaround time between label submittal and receipt of the official **Label Review Officer Worksheet** with feedback from the label review officer. After review, a label will be classified into one of two outcomes:

1. **Acceptable:** A label is considered “Acceptable” if all regulations, standards, policies, and required features relating to the label are correct and in compliance. A label may be marked as acceptable for use but also accompanied by suggestions if the reviewer found minor spelling, punctuation, or grammatical errors.
2. **Unacceptable:** A label is considered “Unacceptable” if one or more corrections are needed before the label will satisfy regulations, standards, policies, or required features. After making all requested changes to an unacceptable label, an establishment must resubmit the corrected version along with the original Label Review Officer Worksheet for further review, prior to producing the product for sale.

Questions about the feedback on the Label Review Officer Worksheet should be directed first to the IIC, who will communicate with the label reviewer if necessary. Once a label has been declared acceptable for use, the establishment must maintain a copy of all documentation associated with that label and its review. (If requested, an establishment must be able to supply this documentation to the MDA.)

Submitting Revisions for a Label Deemed “Unacceptable”

If a label is deemed unacceptable, the following process will take place:

- The Label Review Officer Worksheet will be stamped with an electronic stamp by the label review officer stating the label is unacceptable for use and cannot be used on inspected products until noted changes are made to satisfy all regulations pertaining to the label.
- The stamped Label Review Officer Worksheet will be emailed to the IIC or EIAO responsible at the establishment.
- The IIC or EIAO will then pass along to the establishment personnel and review the comments noted on the Label Review Officer Worksheet.
- It is then the establishment’s responsibility to make the appropriate changes to the label.
- Once the changes have been made, either the establishment or IIC/EIAO must email the corrected label along with all the documents for the label review package and the Label Review Officer Worksheet to the MDA.MeatPoultryEgg@state.mn.us email inbox.
- The label review package will once again be assessed by the label review officer, data will be managed in the label review intake, and the label review officer will review the corrected label.
- If the label is acceptable for use, it will be marked as such and sent back using the same process of an acceptable label.
- If the label is still found unacceptable for use, the Label Review Officer Worksheet will be updated, stamped as unacceptable, and emailed back to the IIC/EIAO to pass along to the establishment to make changes.
- The process will continue until the establishment has submitted a label that complies with all regulations and is deemed acceptable for use.

Making Label Revisions After the Original Label has Been Accepted

An establishment may make certain minor revisions to an existing, acceptable label without needing to resubmit that label to the MDA for review. Examples of these types of revisions include:

- Proportionately enlarging or reducing all features of the label
- Substituting any unit of measurement with its abbreviation or vice versa (e.g., “lb.” for “pound”)
- Adding or removing decorative illustrations
- Changing establishment logos or illustrations
- Changing the name or address of the packer, manufacturer, or distributor
- Updating establishment numbers that have been newly assigned or revised
- Making a change to reflect a change in the quantity of an ingredient shown in the formula without a change in the order of predominance shown on the label (e.g., increasing the amount of salt in a formula without changing where salt needs to be listed in the order of ingredients)
- Deleting any claim or non-mandatory feature/information on the label
- Adding safe handling instructions

The revised label must maintain all mandatory features in conformance with federal and state labeling regulations, and the revisions must not relate to the inherent nature of the product. As mentioned previously, each establishment is responsible for the content of its labels; when changes are made, it is important to understand if those changes impact the review process.

ADDITIONAL LABELING INFORMATION

For further information, contact your local inspector or the MDA Meat, Poultry, and Egg Inspection Program at 651-201-6300 or MDA.MeatPoultryEgg@state.mn.us.

RESOURCES

Resources from the USDA Food Safety and Inspection Service (FSIS)

- General inquiries: <http://askfsis.custhelp.com/>
- Labeling Policies: www.fsis.usda.gov/wps/portal/fsis/topics/regulatory-compliance/labeling/Labeling-Policies
- Labeling Procedures: www.fsis.usda.gov/wps/portal/fsis/topics/regulatory-compliance/labeling/labeling-procedures
- Food Labeling Fact Sheets: www.fsis.usda.gov/wps/portal/fsis/topics/food-safety-education/get-answers/food-safety-fact-sheets/food-labeling
- Compliance Guideline for Label Approval: www.fsis.usda.gov/wps/wcm/connect/bf170761-33e3-4a2d-8f86-940c2698e2c5/Label-Approval-Guide.pdf?MOD=AJPERES
- Food Standards and Labeling Policy Book: www.fsis.usda.gov/wps/wcm/connect/7c48be3e-e516-4ccf-a2d5-b95a128f04ae/Labeling-Policy-Book.pdf?MOD=AJPERES
- Processing Inspectors’ Calculations Handbook: www.aamp.com/foodsafety/documents/Directive7620-3.pdf
- A Guide to Federal Food Labeling Requirements for Meat, Poultry, and Egg Products: [/www.fsis.usda.gov/wps/wcm/connect/f4af7c74-2b9f-4484-bb16-fd8f9820012d/Labeling_Requirements_Guide.pdf?MOD=AJPERES](http://www.fsis.usda.gov/wps/wcm/connect/f4af7c74-2b9f-4484-bb16-fd8f9820012d/Labeling_Requirements_Guide.pdf?MOD=AJPERES)
- Labeling Guideline on Documentation Needed to Substantiate Animal Raising Claims for Label Submission: www.fsis.usda.gov/wps/wcm/connect/6fe3cd56-6809-4239-b7a2-bccb82a30588/RaisingClaims.pdf?MOD=AJPERES

Additional Resources

- Uniform Retail Meat Identification Standards (URMIS) information for labeling single ingredient meat cuts: www.meattrack.com/urmis/ (create a free account to use this resource)
- The Meat Buyers Guide: Available for purchase from the National Association of Meat Purveyors (NAMP)
- For a complete description of the regulations related to safe handling information see the CFR title 9, parts 317 and 381 (Federal Register, Vol. 59, No. 59, pages 14528 through 14540); 9 CFR § 412.1 describes the types of labels which need to be submitted to the MDA.

APPENDIX A: CLAIMS NEEDING REVIEW

The Minnesota Department of Agriculture (MDA) must review labels bearing certain special statements and claims prior to those labels entering commerce. This list below contains some examples. Any label bearing a special statement or claim must be submitted to the MDA. Supporting documentation for a special statement or claim must be included as part of the labeling record. In addition, products may need to be submitted when certain labeling claims are made and would be collected as part of other assigned sampling (e.g., Nutrition Facts Panel claim on raw ground beef, soy free claim on ready-to-eat products).

- Allergen warning statement from processing in a meat and poultry plant (e.g., “made in a facility that also processes tree nuts and soy,” “we cannot prevent cross contamination,” and “may contain soy”)
- American Heart Association (AHA)
- Animal production claims (e.g., no added antibiotics, no hormones added, raised without antibiotics, vegetarian fed)
- Breed claims (e.g., Angus, Berkshire, Certified Angus, Hereford)
- Cage Free
- Certified Claims (e.g., certified organic, certified gluten free, certified halal, certified Parma Ham)
- Certified State programs (e.g., certified product of Louisiana)
- Certified tender
- Environmentally Raised
- Egg Free
- Family Farmed Raised
- Farm Raised
- Free from allergen program
- Free Range
- Fruit claims (e.g., made with real fruit, made with fruit, made with cranberries)
- Geographic logo or flag (e.g., Eiffel tower, Mount Rushmore, outline of a specific state or country)
- Gluten Free (certified or non-certified)
- Health claims defined in 21 CFR 101.14 and 101.70-83
- Humanely Raised
- Implied nutrition claims
- Labels for sample product with special statements and claims
- Lightly breaded
- Local, Locally Raised, Grown Locally, Locally Sourced in geographic location (e.g., locally sourced in New York)
- Made without genetically engineered ingredients claim (that do not have USDA organic certification on the label)
- Milk from cows not treated with rBST (no significant difference has been shown between milk derived from rBST treated and non rBST treated cows statements on FDA products incorporated into USDA products)
- Minimally processed

- Natural claims (e.g., All Natural, 100% Natural, Made with Natural Ingredients)
- Negative or “Free” claims (e.g., no additives, no alcohol, not all natural, no animal by-products, no artificial colors, no artificial ingredients, no artificial preservatives, no breeding, no butter, casein free, no certified colors, no certified synthetic colors, no dairy, egg free, no gestation crates, gluten free, no gluten ingredients, not gluten free, no growth promotants including ractopamine, no high fructose corn syrup, no imitation anything, lactose free, no lard, no liquid smoke, no mechanically separated chicken, no mechanically separated pork, chicken or turkey, no MSG, no MSG added, no nitrites or nitrates, nut free, no oil, peanut free, no pork added, no poultry added, no preservatives, not preserved, no ractopamine a beta agonist growth promotant, no solutions added, not stunned, no synthetic colors, tree nut free, no water added, Non GMO)
- Statements that bioengineered or genetically modified ingredients or animal feed were not used in meat, poultry or egg products
- Nutrition factual statements (e.g., 0 grams carbohydrates per serving, check marks associated with nutrition claim, nutritional facts up front, 0 grams trans-fat per serving)
- Omega 3 factual statements (e.g., 200 mg omega 3 fatty acids per serving or any other use of the word omega 3, synonym for omega 3, or type of omega 3 fatty acid-alpha linoleic acid); For more information, refer to the Food Safety and Inspection Service Guidance on the Labeling of Omega Fatty Acids Claims on Meat, Poultry and Egg products
- Organic claims (e.g., organic, made with organic ingredients)
- Organic ingredients in the ingredients statement (e.g., organic wheat flour, organic soy sauce)
- Paleo, Paleo Certified, Paleo Friendly
- Pasture Raised
- Sampled and tested claims for STEC organisms Compliance Guidelines for STEC Organisms Sampled and Tested Labeling Claims
- Safety claims (e.g., #1 Food Safety Priority, High pressure processing was used in the manufacturing of this product)
- Serving sizes in the nutrition facts panel that deviate from 9 CFR 317.309 and 9 CFR 381.409 or Guideline documents (e.g., “meal for 2” with the serving size of “½ package (300 g).” This is not in accordance with the RACC in 9 CFR 317.312 or 381.412 or the serving size rules in 9 CFR 317.309 (b) or 9 CFR 381.409 (b))
- State endorsement programs that have a geographic emblematic design (e.g., “Go Texan” with map of Texas, “Pride of New York” with map of New York) or third-party State Certification Programs (e.g., Arizona Grown, 100% Made in Puerto Rico)
- Sustainable, sustainable farming, Sustainably Raised
- Symbols on the label (e.g., arrows or check marks)
- Third-party raising claim programs (e.g., Agricultural Marketing Service (AMS) Processed Verified or Certified programs, American Grass-fed Association, Animal Welfare Association, Global Animal Partnership)
- U.S. Farm Fresh
- Uncured in the product name/uncured in the ingredients statement
- Vegetable claims (e.g., made with premium vegetables, made with vegetables, 40% daily value of vegetables, made with Grade A vegetables)
- Whole grain claims (e.g., made with whole grain, whole grain stamp, whole grain seal, whole grain in the product name, whole grain claims on Child Nutrition (CN) labels, whole wheat in the product name, whole grain)

APPENDIX B: CLAIMS NOT NEEDING MDA REVIEW

The following are examples of statements and claims that do NOT require MDA review prior to use. These factual statements and claims may be reviewed using an in-plant review if the label complies with all regulatory requirements and the statement or claim is truthful and not misleading. Supporting documentation for the statement or claim must be part of the labeling record.

- 100% American Farmed
- All, 100%, pure that complies with 317.8(b)(34)
- Aged/dry aged
- Air Chilled
- Allergen or “contains” statements at the end of ingredients statement
- Allergen warning statements carried over from FDA products and listed at the end of the FDA component sub-listing in the ingredients statement
- Amish
- AMS Grading for (e.g., prime, choice, select, grade A)
- Ancient grain, made with
- Awards
- Certified by SQF Quality Supplier
- Contains: a certain ingredient (states the presence of certain ingredients) e.g., contains MSG, contains honey
- Country of origin statements (COOL) per 9 CFR 317.8 (b)
- Extra and more than statements (e.g., cheesier macaroni and cheese, more chicken less breading)
- Geographic claims that comply with 9 CFR 317.8 (b)(1)
- Geographic flag with corresponding statement, (e.g., American Flag Accompanied by statement Made in the USA)
- Geographic style defined in 9 CFR 317.8 (b) (1) and the Food Standards and Labeling Policy Book (e.g., country style, Italian style, Mexican style)
- Geographic styles undefined (e.g., German style, Tuscan style.) Labels making this type of claim must have documentation of the approval of a third-party authority in their labeling record in support of the use of the undefined style.
- Green claims or environmental claims (e.g., BPA Free (packaging), made with recycled materials, made with soy ink)
- Guarantees
- Hand hung, hand pulled style, and hand pinched style
- Handcrafted, handmade, hand slaughtered, hand crafted style
- Healthy Ideas logo
- Home style
- Ice glazed
- Inserts, tags, liners, posters and like devices
- International trade membership organization (e.g., USA Poultry and Egg Export Council)
- Irradiation, irradiation symbol
- Kosher claims on products
- Labels for amenable products containing exotic species
- Labels for inedible product
- Labels for non-certified pet food
- Labels for sample product without special statements and claims
- Lightly Seasoned

- Made by or made with statements (e.g., Made by Native Americans, made with rice from cooperatives in geographic area, women owned)
- Made in USA
- Multi-grain, made with
- New, new and improved, New flavor
- Non-certified religious exempt product (Halal guarantee, Halal on products receiving the mark of inspection, Halal Style, Halal symbol with trademark, Kosher)
- Nutrition claim, defined in 9 CFR 317.313-317.380 and 9 CFR 381.417-381.480
- Nutrition Facts panel
- Oven roasted or similar statements
- Piece count
- Processed in the USA 100%
- Product of USA
- Products not intended for human consumption
- Products with standard of identity (e.g., meatloaf)
- Products without standard of identity (e.g., Wild Rice Bratwurst)
- Promotions or other similar statements on the label (e.g., charity, holiday, kid tested, kid approved)
- Ready in/cooks in (number of seconds or minutes)
- Retained water statements
- Single ingredient products without claims (single cuts of meat and poultry)
- State endorsement programs that do not have a geographic emblematic design, (e.g., Kentucky Proud, Made with Wisconsin Cheese)
- Statements of limited use (e.g., for further processing, for HRI, institutional use only, for food service use only)
- Statements relating to free components (e.g., free packet of hot sauce included)
- Substitution of any unit of measurement with its abbreviation or any abbreviation with its unit of measurement
- Transglutaminase enzyme (TG) (products containing this ingredient)
- Wholesome from the beginning
- Wrappers or other covers bearing pictorial designs, non-geographic emblematic designs or illustrations (e.g., floral arrangements, illustrations of animals, fireworks)
- X-rayed for bone detection

APPENDIX C: FORMULATION

Begin with the formula
you use for your product

**Bob's Signature Cured
Bratwurst Formula**

30 lbs. pork
20 lbs. beef
20 large eggs
10 cups water
5 tbsp. black pepper
3 1/3 tbsp. cayenne pepper
3 1/3 tbsp. paprika
1/2 cup dry mustard
3 1/3 tbsp. salt
3/8 cup sugar
3/8 cup onion powder
0.025 lbs. sodium erythorbate
0.1248 lbs. cure
sheep casing

Convert all
measurments
to pounds

Converting to pounds:
Weigh volumetric
measurements with scale;
Divide ounces by 16 OR
multiply by 0.0625.

30 lbs. pork
20 lbs. beef
2.25 lbs. eggs
5.30 lbs. water
0.08 lbs. black pepper
0.075 lbs. cayenne pepper
0.075 lbs. paprika
0.11 lbs. dry mustard
0.10 lbs. salt
0.16 lbs. sugar
0.0925 lbs. onion powder
0.025 lbs. sodium erythorbate
0.1248 lbs. cure
sheep casing

Put ingredients
in order of
predominance

30 lbs. pork
20 lbs. beef
5.30 lbs. water
2.25 lbs. eggs
0.16 lbs. sugar
0.1248 lbs. cure
0.11 lbs. dry mustard
0.10 lbs. salt
0.0925 lbs. onion powder
0.08 lbs. black pepper
0.075 lbs. cayenne pepper
0.075 lbs. paprika
0.025 lbs. sodium erythorbate
sheep casing

Use the list of ingredients that has been
converted to pounds and listed in order of
predominance on the formulation sheet
for multi-ingredient meat products.

If an ingredient used has sub-ingredients,
attach copy of the ingredient statement to
the formulation sheet.