



Label Submission Checklist

Below is a checklist that provides guidance on the preparation and submission of label applications.

Label Sketch

Are the up-to-8 required features on the label? Are they in the required locations according to 9 CFR 317 and 381, Subparts N and Y, and consistent with the food standards in 9 CFR 319 and 381, Subpart P?

- **Product Name** (9 CFR 317.2(c)

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr317.2.htm> and 381.117

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr381.17.htm>)

- Is there an accurate product name?
- Does the name invoke a standard?
- Is that standard met, i.e., is it shown, through the formulation and processing procedures, that the standard is met? For example, 9 CFR 317.312 <http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr317.312.htm> "Beef in Barbeque Sauce" requires 50% cooked beef that is cooked to yield 70% or less. If the beef is injected, the yield is from the green weight of the un-injected beef.

- **USDA Inspection Legend** (9 CFR 312.2

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr317.2.htm>, 317.2(i)

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr317.2.htm>, 381.96

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr381.96.htm>)

- Is there an inspection legend on the label?
- Is the correct legend used?
- Is the correct plant number used?
- If dual legends are used, is the product HRI only?
- Is the Establishment # in the legend, if not where is it?

- **Net Weight** (9 CFR 317.2(h), 381.121

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr317.2.htm>)

- Are the size, spacing and location correct?
- If no net weight, did you stipulate net weight applied at retail?

- **Handling Statement** (9 CFR 317.2(k)

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr317.2.htm>, 381.125(a)

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr381.125.htm>)

- Is the handling statement appropriate?
- Is the handling statement supported by processing procedures?
- Does the handling statement conflict with claims, i.e., "fresh"?

- **Address (Signature) Line** (9 CFR 317.2(g)

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr317.2.htm>, 381.122

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr381.122.htm>)

- Is a zip code included?
- Is the address line contiguous to the ingredients statement on the information panel?
- Does the signature line require "Distributed by" or "Packed for"?

- **Ingredient Statement** (9 CFR 317.2(f)

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr317.2.htm>, 381.118

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr381.118.htm>)

- Are all multi-ingredient components sublisted?
- If the product is an import, are all spices/natural flavors identified by their common or usual name in the formula?
- Is the order of predominance supported by the formula?
- Is the ingredients statement presented as components (i.e., with component ingredients sublisted) or as a composite of all ingredients?
- Are common or usual names, not brand/trade names, used in the formula?

- **Nutrition Facts** (9 CFR 317.300 - 317.400

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr317_05.html>, 381.400-381.500

<http://www.access.gpo.gov/nara/cfr/waisidx_05/9cfr381_05.html>)

- Is the correct RACC used for the serving size?
- Is the serving size correctly stated?
- Does rounding of nutrients meet requirements?
- Is the format correct (i.e., full, simplified, or tabular)?
- Are claims supported by the numbers?
- Is the "servings per container" accurate and not "varied," if the product bears a net weight?
- Do bone-in products indicate percent bone?
- For bone-in products, is the "serving size X servings per X" statement accurate? Bone/inedible portion is not included in the nutrition information.

- **Safe Handling Instructions (SHI)** (9 CFR 317.2(l)

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr317.2.htm>, 381.125(b)

<http://edocket.access.gpo.gov/cfr_2008/janqtr/9cfr381.125.htm>)

- Are the current SHI included when necessary?
- If the SHI are modified in accordance with regulations, are there specific handling instructions on the label to support the modification?

USDA/FSIS Label Submission Form 7234-1

- Is the product amenable to the FMIA or PPIA?
- Does the product contain at least 2% cooked or 3% or more raw meat or poultry?
- Is the product for human consumption or a certified pet food?

- Is the approval (application) form submission complete, i.e., form completely filled out, with the required number of copies? [Generally 2 copies are needed; however, 3 copies are needed for export/import labels and labels with Child Nutrition, and organic/animal production claims.]
- Is the submission legible, and does the product formula have percent or weights that are totaled at the bottom?
- Does the submission provide a size for the PDP and total available labeling space?
- Does the processing procedure support any claims/statements made on the label?
- Is the product smoked, and is the source of smoke indicated (e.g., Hickory)?
- Is the product sliced, ground, formed, etc.?
- Is the product dried? Is the MPR provided?
- If a cooking temperature is provided, is it appropriate?
- Is a percent pick-up of solution/breading/coating stated?
- Is the product Ready to Eat (RTE) or not RTE (nRTE)? Is an explanation provided for nRTE products that appear to be RTE?
- Does the formula match the ingredients statement? Tips:
- Chicken is not chicken breast meat
- Chicken meat is not chicken tender
- Chicken tender is not chicken tenderloin
- Beef is not veal
- Pork trimmings are not bacon
- Angus is not Black Angus
- Is the formula presented in the same units adding to "100%" or all in pounds (not a mix of pounds and ounces)?

Common Mistakes on Label Submissions

- No sublisting of multi-ingredient components on the label
- Percent restricted ingredients not provided or supported in submission (e.g., the percent of fat in the product is required for some ingredients)
- Binders in the solution pumped in meat or poultry products are not included in product names/qualifiers
- Order of predominance of ingredients is wrong
- Geographic claims and styles not supported by data
- Nutrition claims not supported by data or permitted by regulations
- Not enough copies of submission forms
- Submission is not legible (labels or application)
- Reason for a temporary label approval is not supported by required information (see below)
- Product name prominence/letter size conflict with requirements
- Meaningful terms/claims are not validated on the application, e.g., #1 seller of franks in the West is not supported by data

Temporary Approval Requests

(9 CFR 317.4 <<https://www.govinfo.gov/content/pkg/cfr-2008-title9-vol2/xml/cfr-2008-title9-vol2-sec317-4.xml>>/ 317.9 <<https://www.govinfo.gov/content/pkg/cfr-2008-title9-vol2/xml/cfr-2008-title9-vol2-sec317-9.xml>>, 381.132 <<https://www.govinfo.gov/content/pkg/cfr-2008-title9-vol2/xml/cfr-2008-title9-vol2-sec381-132.xml>>)

- Specify the problem that has caused the need for a temporary label
 - If the reason is a formula change, provide new nutrition profile
 - Specifically list ALL ingredients in the product formulation and NOT on the label
- Additional information required by the Federal meat/poultry inspection regulations for granting a temporary:
 - support that the label error does not misrepresent the product
 - support that the label error does not pose any health, safety or dietary problems
 - support that denial of the temporary approval would create undue economic hardship
 - support that granting the approval does not give the manufacturer an unfair competitive advantage

Common Abbreviations in Comments on Label Submissions

- IS - Ingredients Statement
- PN - Product Name
- NF - Nutrition Facts
- SS or S/S - Serving Size
- S/C, SC or S Per - Servings per Container
- RACC - Reference Amount Customarily Consumed
- NW or Net Wt - Net weight, usually size, spacing or location problems
- HS - Handling statement
- SL - Signature (Address) Line
- OOP - Order of Predominance in the ingredients statement
- RTE - Ready-to-eat
- NRTE --Not ready-to-eat

- MPR - Moisture protein ratio
- HRI - Hotel, Restaurant, Institution

Additional Information Sources

Need additional information? Contact the Agency's Labeling and Program Delivery Division which provides guidance, policies and access to the Federal meat and poultry inspection regulations.
