10 Most Common Mistakes (www.fsis.usda.gov)

1. Ingredients statement problems.
   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.
   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.
   c. Order of predominance in the ingredients statement is incorrect.
   d. There are ingredients declared in the ingredients statement that are not in the formulation and vice-versa.
   e. Multi-ingredient components are missing their sub-listings.

2. The formulation, processing procedure and/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.

3. Either the entire label is illegible or portions of the label are illegible.

4. The label is incomplete since all required labeling features are not provided.

5. Product standards are not met.

6. Product name is incorrect, e.g., “BBQ” on the label of a sauce with beef product, yet, standard 9 CFR 319.80 or 319.312 is not met.

7. Product name word size incorrect.

8. Geographical claim on label but product not produced in claim location, e.g., “St. Louis Toasted Breaded Beef Ravioli” on labeling of product manufactured in Vineland, New Jersey.

9. Nutrition facts problems:
   a. The serving size is incorrect.
   b. The servings per container is incorrect.
   c. The wrong format is used.
   d. Improper rounding of the values.

10. Undefined nutrient content claims are used, e.g., leaner, sugar busters, very low in fat

This is just a summary of food label requirements. For additional information, please contact: Charan Wadhawan, Food Scientist
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General Labeling Guidelines
(summarized)

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WHY A FOOD LABEL?

Food labeling is mandated by federal and state laws to ensure accurate representation of the product. The FDA regulations on labeling are written in the Code of Federal Regulations (CFR), Title 21, www.access.gpo.gov/cgi-bin/cfrassemble.cgi?title=200421. The USDA requirements for meat and poultry are written in the CFR, Title 7.

Labeling is used for two purposes:
- Inform the consumer (name, ingredients, cooking/reconstitution instructions, size, and processor).
- Market the product.

There are two ways to label packages and containers: a. Place all required label statements on the front label panel (the principle display panel or PDP), or b. Place certain specified label statements on the PDP and the other labeling on the information panel (the label panel immediately to the right of the PDP, as seen by the consumer when facing the product).

NAME OF PRODUCT

The common or usual name of the product is shown in bold letters and referred to as the Statement of Identity. This is placed on the front label panel (the principle display panel or PDP). Minimum type height is 1/16 inches. Details in 21CFR 101.3

NET QUANTITY

The net amount of the product inside the package must be declared in the lower 30 percent of the PDP. The net amount (weight or volume) must be expressed both in the US and metric scale. The minimum type size is 1/16 inches. Choose a print style that is prominent, conspicuous and easy to read. 21CFR 101.105

BRAND NAME

Brand name is usually placed on the top of the front label. Providing a brand name on the label is voluntary.

NUTRITION FACTS

Mandatory nutrition labeling of most packaged foods is required by FDA or USDA (meat and poultry). The heading “Nutrition Facts” must be the largest type size on the nutrition label i.e. it must be larger than 8 point.

21 CFR 109 (a). The “Nutrition Facts” label may be placed together with ingredient list and the name and address (name and address of the manufacturer, packer, or distributor) on the PDP.

LIST OF INGREDIENTS

Ingredients appear in descending order of predominance by weight. If less than 2% by weight, the ingredient can be listed at the end with a statement that states “contain 2% or less of__.” Always list the common or usual name for ingredients. When an approved chemical preservative is added to a food, the ingredient list must include both the common or usual name of the preservative and the function of the preservative by including terms, such as “preservative,” “a mold inhibitor”.

The ingredient statement may be on either the PDP or the information panel, below the nutrition facts and above the manufacturer or distributor name and address.

PLACE OF ADDRESS

The name, address and zip code of the food manufacturer or distributor must be listed on the lower portion of the information panel.

DATES & HANDLING INSTRUCTIONS

Perishable products must give handling instructions, such as “keep refrigerated” or “keep frozen.”

Quality Assurance Date (pack, sell by, use by expiration) is required for food items that have shelf life of 90 days or less. Frozen foods, meat and poultry items, fresh fruits and vegetables are exempted.

Pack date is the date the product was packaged. Sell by date is the last day the product should be sold. Use by date is the last date the product is expected to maintain top quality. Expiration date is the last day the product should be consumed.

UNIVERSAL PRODUCT CODE (UPC)

UPC code consists of 10 digits and a series of vertical bars above the numbers. The first five digits name the manufacturer and the last five identify the product (wheat, corn, flour, peas etc.). The scanner relays information to the store computer about bar combinations, identifying what certain combinations mean. This information is useful in tracking inventory and pricing. UPC code can be obtained from Uniform Code Council, Dayton, Ohio, 937-435-3870 or 800-543-8137.