

PART 2: Labeling Compliance (08/07/2008)

Section 2: Label Compliance for Imported Meat and Poultry Products

Labeling Claims, Qualifiers, Grades, and Standards

I. Qualifiers

A. Examples that shall be included in the product name on the shipping container:

- With Natural Juices
- Water Added
- X% Water Product

B. Examples that do not have to be included in the product name on the shipping container:

- Caramel Color Added
- Smoke Flavor Added
- Containing up to X% of a solution
- BHA.BHT added to help protect flavor
- Binders Added
- Flavored with (name of flavoring)
- Calcium propionate added to prevent spoilage
- Sprayed with a solution of potassium sorbate to maintain freshness

II. Animal Production and Raising Claims

(<http://www.fsis.usda.gov/OPPDE/larc/Claims.htm>)

Animal production or raising claims are not considered part of the product name. Therefore, it is acceptable for the immediate container to contain the labeling “claim” but the shipping container doesn’t. Some examples of animal production and organic claims are:

- Raised without added hormones
- Raised without antibiotics
- Not fed animal by-products
- Free range
- Free roaming
- Grass fed
- Corn fed
- Grain fed
- Organic (<http://www.fsis.usda.gov/OPPDE/larc/Organic.htm>)

III. Negative and Natural Claims (<http://www.fsis.usda.gov/OPPDE/larc/Claims.htm>)

Negative and natural claims are not considered part of the product name. Therefore, it is acceptable for the immediate container to contain the labeling “claim” but the shipping container does not. Some examples of negative and natural claims are:

- No preservatives
- No MSG, MSG Free
- No artificial coloring
- No artificial flavors
- No artificial ingredients
- All Natural

IV. Nutrient Content Claims (<http://www.fsis.usda.gov/OPPDE/larc/Claims.htm>)

Nutrient content claims are not considered part of the product name. Therefore, it is acceptable for the immediate container to contain the labeling “claim” but the shipping container doesn’t. Some examples of nutrient content claims are:

- Low Fat, Low Sodium, Low Cholesterol, etc.
- Fat Free (% fat free)
- Lean, extra lean
- Healthy
- Good Source, High in, More
- Light, lite

V. Quality or Yield Grades

A. Meat

The use of “USDA” and/or a USDA quality grade (e.g. prime, choice, select) on the shipping or immediate container of imported meat products is unacceptable. Exceptions are:

- Canada has a “Prime” grade designation, so it is acceptable for product to be labeled “Canada Prime”.
- The foreign country must have prior approval from USDA’s Agriculture Marketing Service (AMS) to receive USDA graded product, process, repackage, and export it back to the U.S.

Any imported meat products with USDA quality or yield grades must be placed on HOLD. The product will remain on HOLD until the Agriculture Marketing Service (AMS) confirms that a control procedure has been approved for the foreign establishment that produced the product. Import inspection personnel should contact their Regional Import Field Office (RIFO) for assistance.

Import inspection personnel may also refer to FSIS Labeling Policy Memo 101A, “Use of Quality Grade Terms and Subjective Terms on Labels,” dated 8/30/88 and/or the Food Standards and Labeling Policy Book for information related to an individual company’s claims of Choice, Select, Prime, and other grade term designations.

B. Poultry

AMS recognizes the Canadian Food Inspection Agency’s (CFIA) poultry product grade designations provided the poultry graded for export to the United States satisfies the criteria for U.S. grades. Canadian product labeled with CFIA grades will be accepted provided the shipment is accompanied by an official CFIA grading certificate stating that the product meets USDA grade standards (example “Young

Turkey Canada A”). For an example of the AAFC/AAC form 1022 “Certificate of Inspection (Egg and Poultry) see **Table 1**. This certificate is in addition to FSIS’s foreign inspection (health) certificate requirement for poultry.

If graded product is received without the accompanying grading certificate, import inspection personnel must reject the shipment until a grading certificate is provided, or the reference to the poultry product grade has been obliterated or removed.

VI. Religious Claims

USDA/FSIS does not require any certification for labeling in reference to a religious organization. This should not be confused with religious slaughter exemptions as outlined in Part 4, Section 3, Enclosure 3, “Procedures for Buddhist Style Poultry (Head and Feet Intact) from Canada” of the import manual.

VII. USDA Approved or Certified Establishment Claims

Statements on imported products or their containers referencing that the foreign plant is approved or certified by USDA are inaccurate and should not be accepted. Some examples are:

- Establishment Approved for the Department of Agriculture of the United States of North America – USDA.
- USDA Approved Plant
- USDA Certified Plant
- Establishment Approved by the USDA

Statements that are not false or misleading can be allowed. Some examples are:

- Product produced in an establishment certified to export to the U. S.
- Product produced under an inspection system certified by the USDA to export to the U.S.
- Product produced under a “HACCP” system or similar

VIII. Boneless Beef Trimmings or for Manufacturing

Boneless beef labeled as “beef trimmings” is derived from the skeletal muscle from a beef carcass, including beef from advanced meat recovery (AMR) systems. Beef trimmings must have visible lean which historically has represented 12% lean tissue. Head meat and cheek meat are considered meat; however, they are restricted in certain products and therefore, must be declared as such (i.e., cannot be in a product declared only as “beef trimmings”). Beef tongue, lips, internal organs (e.g., heart meat), and spinal cords are not considered to be “meat” and therefore, are not permitted in “beef trimmings.”