

Export Labeling Approval Chart

The chart below provides additional guidance on whether a label for export only with deviations from domestic requirements (9 CFR 317.7 and 9 CFR 381.128) should be submitted for sketch approval. For more information about generic approval and label submission, please refer to the [FSIS Compliance Guidance for Label Approval](#)

Three ways an export label is approved:

- 1) The export label complies with domestic requirements and **does not** fall into one of the four categories in 9 CFR 412.1. *Generically approved; see 9 CFR 412.2*
- 2) The export label falls into one of the four categories in 9 CFR 412.1 or has labeling deviations. *The label requires submission to LPDS.*
- 3) The final export label has been prior approved, and the company is making a change.
 - a) If the change does not affect prior approved claims, create a new labeling deviation, or add new claims or special statements, the change is *generically approved* under 9 CFR 412.2 and does not require submission to LPDS.
 - b) If the change does affect prior approved claims, create a new labeling deviation, or add new claims or special statements, the change requires submission to LPDS for approval under 9 CFR 412.1. See the [FSIS Compliance Guidance for Label Approval](#)

	LABEL ATTRIBUTES	ACTION	REGULATORY AUTHORITY
A	Meets FSIS domestic requirements.	Generic approval permitted if allowed domestically.	9 CFR 412.2
B	Deviates from FSIS domestic requirements (with exception of labels printed in foreign language or labels with net weight expressed in metric units).	Sketch approval required. Label submission should include supporting documentation verifying foreign government acceptance of the labeling deviation.	9 CFR 412.1
C ₁	Previously sketch approved with changes that do not affect any claims or create new labeling deviations.	Generic approval is allowed.	9 CFR 412.2
C ₂	Previously sketch approved with changes that do affect claims, create new labeling deviations, or adds new claims.	Sketch approval required.	9 CFR 412.1
D ₁	The addition of a foreign language sticker with additional labeling information required by the importing country. The sticker does not add a claim or new labeling deviation.	Generic approval is allowed.	9 CFR 412.2

D ₂	The addition of a foreign language sticker with additional labeling information required by the importing country. The sticker adds a claim or new labeling deviation.	Sketch approval required.	9 CFR 412.1
E	Foreign language only, the addition of direct translation of foreign language on English labels, and/or net weight expressed in metric.	Generic approval is allowed if these are the only labeling deviations. English translation must be part of labeling record and must have Est. number and inspection legend in English. (9 CFR 317.7; 381.128)	9 CFR 412.2

For additional information on labeling, please refer to: [Labeling/Label Approval](#)