

Integration of Paper Label Applications into the Label Submission and Approval System (LSAS)

The Labeling and Program Delivery Staff (LPDS) is now integrating paper label applications into the electronic Label Submission and Approval System (LSAS) for evaluation and adjudication. Once LPDS has reviewed it, the completed paper label submission will be printed and delivered to the applicant or agent in the same manner in which it was received.

To avoid delays, LPDS recommends using the online web submission process. LPDS strongly encourages applicants to register for a Level 2 eAuthentication account to submit their label request electronically through LSAS, rather than using paper applications. Additional information on LSAS is available on our website at:

<http://www.fsis.usda.gov/wps/portal/fsis/topics/regulatory-compliance/labeling/label-submission-and-approval-system/lsas>

Note: There are no USDA service centers located outside of the U.S. for individuals in foreign countries. FSIS does not maintain these offices or their functions. To find the nearest USDA service center office, visit: <https://offices.sc.egov.usda.gov/locator/app?type=lra>.

Applicants who wish to continue submitting paper applications need to be mindful that LPDS will scan the paper label submissions into the web-based system for evaluation. To facilitate this process the following guidance is essential for applicants to consider when submitting paper labels. LPDS will return to the applicant or agent any paper label application that does not meet the guidance provided below.

DO

- **Type** FSIS 7234-1 - Application for Approval of Labels, Marking or Device, or FSIS 8822-4 - Request for Label Reconsideration. Note: Only official forms are acceptable in the conduct of Agency business. Forms are available at: <http://www.fsis.usda.gov/forms>. FSIS 7234-1 is available as fill-and-print capability.
- Complete all required fields on the form in the expected format; for example, Blocks 7a and 7b require numeric input only. Do not leave blank, or use negative numbers; Block 5b, select only one category.
- If an establishment voluntarily submits a generically approved label to LPDS for review, in addition to completing all applicable claims in Block 10, please type “generic” in the box entitled “Other claims”.
- Provide only the information that is requested or required for each page of the form. Supplementary information may be provided either on the Continuation Sheet or included as a separate attachment (single sided).
- Provide two copies of each label application using a printer (single sided).
- Provide a product label for each label application on an 8 ½” x 11” size paper (single sided).
- Provide supporting documents for special claims, extraordinary circumstances, and temporary request as single sided documentation.

- When using percentage for the product formula, the total percentage of all ingredients must total 100 percent (LPDS will return the submission if the total is over or under 100 percent).
- When using weights for the formula, show in pounds, kilograms, ounces, or grams. Be sure the same measurement is used for each ingredient.
- Use paperclips rather than staples.
- For a resubmittal, include the Label Application Summary from the previous rejected submission.
- To facilitate quicker receipt of the label application, the preferred mailing method for submitting paper label applications to LPDS is FedEx, UPS, or courier. Include a return, pre-paid mail envelope. Label applications received through the U.S. Postal Service (including regular mail, priority, and overnight) are acceptable. However, because all U.S. Postal mail is irradiated, changes in the physical appearance of the label application can occur; e.g., yellowing of pages, burned or scorched pages, pages fused together, brittleness, etc., making the application unacceptable for scanning.

DON'T

- Don't hand write the form
- Don't photocopy the form
- Don't reduce or enlarge the form
- Don't fold the application
- Don't staple the application
- Don't change the page orientation of the form (print in landscape)
- Don't send the label application or label by email to LPDS
- Don't include special characters, bullets, numbered listings, etc., when listing ingredients. Simply list the ingredient name:

Incorrect	Correct
# Beef	Beef
1. Spices	Spices
--Tomato Paste	Tomato Paste
• Ham	Ham

- Don't list ingredient amounts as 0 (zero), or as trace amounts
- Don't list ingredient amounts as < (less than) or > (greater than)
- Don't send product labels in other forms (e.g., plastic containers, netting, corrugated containers, etc.) that can not be scanned using an automatic feeder or a flatbed.
- Don't adhere product labels to the application form
- Don't submit faxed applications. They will no longer be accepted.

The following table provides a quick resource to determine what blocks or fields are required when completing Form 7234-1, and the expected format:

FORM 7234-1 (Application for Approval of Labels, Marking or Device)			
<i>Form Must Be Typed Submit Two Printed Copies Do Not Staple</i>			
Block/Field	Block/Field Name	Response Required?	Additional Guidance
1	Agent Name, Address, etc.	<i>Possibly</i>	If Establishment is using an Agent to act on their behalf, then Block 1 is required Always.
2	For USDA Use Only	Never	Leave Blank
3	For USDA Use Only	Never	Leave Blank
4	Establishment No./Foreign Country	Always	Domestic: M19924, P9002, G1632, I271, V18337 Non Domestic: TIF 263 Mexico, SIF 458 Brazil
4a	Type of Product	Always	Select only one product type
5a	Name of Product	Always	Name as it appears on the label
5b	HACCP Process Category	Always	Select only one category
6a	Type of /Approval Requested	Always	Select only one approval type
6b	Was the Label Previously Approved	Always	Select Yes or No If Yes, and 6a request is for a Temporary or Extension of Temporary, Always complete "Number of labels on hand" and "Number of days requested". Provide supporting documents for extraordinary circumstances, and temporary/extension either on the Continuation Sheet or as a separate single sided attachment.
7a	Area of Principal Display Panel (square inches)	Always	Provide Numeric number only, e.g., 25. Do not leave blank, use negative numbers, or respond with N/A.
7b	Total Available Labeling Space for Entire Package (square inches)	Always	Provide Numeric number only, e.g., 100. Do not leave blank, use negative numbers, or respond with N/A.
8	Does this label include a "USDA-AMS Child Nutrition Program CN-Logo"	Always	Select Yes or No
9	CN Identification Number Assigned	<i>Possibly</i>	If answer in block 8 is "Yes," then block 9 is required to be completed. Include the 6 digit CN number. If you do not currently have an assigned CN number, email AMS at: cnlabeling@ams.usda.gov .

10	Are there any special claims, guarantees, or foreign language on the label?	Always	Select Yes or No. If Yes, select all applicable claims or select "Other Claims" and specify the other claim in the description box, e.g., gluten free. Note: if requesting a Voluntary Review of a generically approved label, select "Other Claims" and type "generic" in description box. Provide supporting documents for special claims either on the Continuation Sheet or as a separate single sided attachment.
11	Name and Address of Firm	Always	Establishment name and address
12	Signature of Applicant or Agent	Always	Include signature and typed name.
13	Date	Always	
14	For USDA Use Only	Never	Leave Blank
15	Product Formula	Always	If using percent, total must equal 100 percent. If using weights for the formula, show in pounds, kilograms, ounces, or grams. Do not include special characters, bullets or numbered listings. Simply list the ingredient name. Do not list ingredient amounts as 0 (zero), or as 'Trace'.
16	Processing Procedures	Always	
	Continuation Sheet	<i>Optional</i>	Can be used to provide supplementary or supporting information, i.e., extraordinary circumstances, temporary request, or supporting information for special claims.
<i>Failure To Follow The Recommended Guidance Will Result In The Label Application Being Returned Without Evaluation</i>			