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USA

Introduction

In the United States, The Food Safety and Inspection Service (FSIS) regulate meat, poultry and egg products. However, all remaining foods are regulated by the Department of Health and Human Service's Food and Drug Administration (FDA). As such, there are different import requirements for different types of imported food.

FDA relies solely on point-of-entry inspection. FSIS, on the other hand, works collaboratively with the importing establishment's government and uses a three-part process to verify that other countries' regulatory systems for meat, poultry and egg products are equivalent to that of the U.S. and that products entering the U.S. are safe and wholesome.

FSIS, instead of dealing directly with individual companies, which the case of the FDA, coordinates with the government of the country before accepting meat, poultry or egg products for sale into U.S. commerce.

Each meat, poultry and egg product shipment enters the country under the authority of U.S. Customs and USDA'S Animal and Plant Health Inspection Service (APHIS) and is transferred to FSIS where inspectors visually inspect every shipment as well as its accompanying documentation.

Any foreign establishment that desires to export to the U.S. must apply to its own government, and that country's chief inspection official must certify to FSIS a list of all establishments in that country that meet FSIS' import requirements.

MILK AND CREAM:

The importation of milk and cream is subject to requirements of the Food, Drug and Cosmetic Act and the Import Milk Act. These products may be imported only by holders of permits from the Department of Health and Human Services, Food and Drug Administration, Center for Food Safety and Applied Nutrition, Office of Food Labeling (HFS-156), 200 C Street, NW., Washington, D.C. 20204; and the Department of Agriculture.

Meat and meat products:

APHIS' Veterinary Services (VS) unit ensures that animals and animal products, such as semen and embryos, can be exported from this country without threatening the animal health in their countries of destination. All commercial shipments of meat and meat food products offered for entry into the United States are subject to the regulations of the Department of Agriculture and must be inspected by the Animal and Plant Health Inspection Service (APHIS) and the Food Safety and Inspection Service (FSIS) prior to release by U.S. Customs. Meat products from other sources (including, but not limited to wild game) are subject to APHIS regulations and the provisions of the Federal Food, Drug, and Cosmetics Act, enforced by the Food and Drug Administration.

<http://www.aphis.usda.gov/index.html>

<http://www.usda.gov/agency/fsis/homepage.htm>

Meat and poultry (including game and fowl),

Products can only be imported from countries and plants approved by the United States. The Federal Meat Inspection Act, requires countries that export meat and poultry to the United States to impose inspection requirements at least equal to U.S. requirements. Imported meat and poultry products are inspected in the country of origin just as domestic products are inspected in U.S. slaughter and processing plants. FSIS reviews foreign inspection systems to ensure that they are equal to the U.S. system. FSIS also reinspects imported meat and poultry products on a sample basis as they enter the United States. Data derived from import reinspection constitute a check on the effectiveness of foreign inspection systems.

To determine if a country is eligible to export meat to the U.S., FSIS evaluates the country's entire inspection system. FSIS reviews the country's laws, regulations, directives, and other written materials that govern its inspection program; reviews administration; and conducts an on-site review of the country's inspection operations. A multi disciplinary team, typically composed of a veterinarian, chemist, food technologist, microbiologist, statistician, and compliance officer, conducts the review. After a country is granted eligibility to export its products to the United States, FSIS relies on the exporting country to certify plants and carry out daily inspection. Individual plants must apply to the country's national inspection authorities for certification to export to the United States. In turn, the chief inspection official in the country certifies to FSIS those plants that meet all applicable standards and are authorized to export to the United States. The number of reinspections in a given year are determined by the country's adherence to the requirements. There may be up to four inspections per year by FSIS.

At the U.S. port of entry all meat products are checked for transportation damage, labeling, general condition, and proper certification and residue level. Residue levels must have certification. U.S. requirements also require foreign countries to impose controls equivalent to those of FSIS to prevent species substitution. A product labeled beef, for example, must be beef and cannot contain a less expensive product. FSIS scientists have developed verification tests which are quick and inexpensive.

The USDA Food Safety and Inspection Service Meat Export Library offer an Export Library System for computer users to obtain U.S. and foreign country specifications requirements for meat and meat products. To connect to the Meat Export Library using a modem, call (202)501-7608. For further information on the database and certification for meat and poultry products contact: FSIS, 1099 14th Street, Franklin Court, Suite 3700W, Washington, D.C. 20005 or telephone: (202) 501-6022; Fax: (202) 501-6029.

Sea food products: FDA's multifaceted and risk-informed seafood safety program relies on various measures of compliance with its seafood Hazard Analysis and Critical Control Points (HACCP) regulations, which describe a management system in which food safety is addressed through the analysis and control of biological, chemical, and physical hazards from raw material production, procurement and handling, to manufacturing, distribution and consumption of the finished product.

For imported seafood, these measures include:

Inspections of foreign processing facilities,

Sampling of seafood offered for import into the United States,

Domestic surveillance sampling of imported products,

inspections of seafood importers,

evaluations of filers of seafood products,

foreign country program assessments, and

relevant information from our foreign partners and FDA overseas offices

FDA is also implementing a new screening system for imports, the Predictive Risk-based Evaluation for Dynamic Import Compliance Targeting ([PREDICT](#)), which will improve the current electronic screening system by targeting higher risk products for exam and sampling and minimizing the delays of shipments of lower risk products. PREDICT will improve the agency's ability to detect trends and

investigate patterns. This, in turn, will help to make more efficient use of FDA's import resources and allow FDA to adjust import sampling levels for seafood products over time and as appropriate.

Imported Food Products Containing a Small Amount of Meat, Poultry, or Processed Egg Product Ingredients.

FSIS statutes provide authority to exempt certain foods containing relatively small amounts of meat, poultry or processed egg product ingredients from FSIS inspection, FSIS must ensure that these ingredients are not adulterated. Accordingly, the meat, poultry, or processed egg product ingredients used in FSIS-exempted products must be from an [eligible source](#), i.e., prepared under USDA/FSIS inspection or in a foreign establishment certified by a foreign inspection system approved by FSIS. Importers of FSIS-exempted products containing meat, poultry, or processed egg product ingredients originating from countries with animal health restrictions [must apply for and obtain a VS-permit](#) from USDA's Animal and Plant Health Inspection Service (APHIS). Also

http://www.aphis.usda.gov/import_export/animals/animal_import/animal_imports_anproducts.shtml

The need for a permit is based on the contents of the food product and on the animal health restrictions APHIS places on the country from which the food product is being imported. Accordingly, FSIS is advising importers of food products not required to have an APHIS veterinary import permit for entry into the U.S. that the meat, poultry or processed egg product ingredients used in the formulation of these products must originate from an approved source in order to qualify for FSIS import eligibility.

Links:

Import Permit Guide for Products with Small Amounts of Meat and Poultry

http://www.fsis.usda.gov/PDF/Import_Permit_Guide.pdf

Countries/Products Eligible for Export to the U.S. (Sep 17, 2010; PDF Only)

http://www.fsis.usda.gov/PDF/Countries_Products_Eligible_for_Export.pdf

Notice of Enforcement by the USDA, FSIS, Regarding Imported Food Products Containing a Small Amount of Meat, Poultry, or Processed Egg Product Ingredients (Mar 19, 2009; PDF Only)

http://www.fsis.usda.gov/pdf/Notice_of_Enforcement_Regarding_Imported_Food_Products.pdf

Apply for and obtain a VS-permit.

http://www.aphis.usda.gov/import_export/animals/animal_import/animal_imports_anproducts.shtml

Learn about e-permits.

http://www.aphis.usda.gov/permits/learn_epermits.shtml

CANADA

Meat and Poultry

Importation of meat and poultry meat products into Canada is regulated by the *Meat Inspection Act and Regulations* and the *Health of Animals Act and Regulations*, administered by the CFIA, and the *Export and Import Permits Act*, administered by the Department of Foreign Affairs and International Trade.

<http://active.inspection.gc.ca/tech/extsite.asp?url=http://laws-lois.justice.gc.ca/eng/acts/M-3.2/>

<http://active.inspection.gc.ca/tech/extsite.asp?url=http://laws-lois.justice.gc.ca/eng/acts/H-3.3/>

section 9-of the meat inspection act :

(1) No person shall import a meat product into Canada unless

(a) at the time it was prepared for export, the country from which it originated and any country in which it was processed had meat inspection systems, those systems and the relevant establishments in those countries were approved in writing by the Minister before that time and the approvals were valid at that time;

(b) that person provides an inspector with evidence satisfactory to the Minister that it meets the prescribed standards for imported meat products;

(c) it meets the prescribed standards for imported meat products; and

(d) It is packaged and labeled in the manner prescribed.

Before the products are imported, the exporting country must be evaluated by the Canadian Food Inspection Agency and found to have a national meat inspection system, including a residue monitoring program, equivalent to that of Canada. As well, foreign establishments must be approved by the Canadian Food Inspection Agency before being eligible to export to Canada.

To prevent the introduction of animal diseases, all importations of meat products are subject to the *Health of Animals Act and Regulations*. Some foreign countries are restricted in the type of product they can export to Canada.

Before they are imported, all prepared meat and poultry products require a label/recipe registration issued by the Canadian Food Inspection Agency. This requirement also applies to all raw meat and poultry sold in consumer packages.

Each commercial shipment of meat must be certified by the foreign national veterinary competent authorities. The certificates, along with other information for all imported meat and poultry meat product shipments, must be presented to the CFIA Import Service Centre for clearance before the shipments are allowed entry into Canada by CBSA officers. All shipments from countries other than USA, must be then presented in one of the Canadian establishments registered under the *Meat Inspection Regulations, 1990* for inspection of imported meat products, for inspection by a CFIA inspector. In the case of meat imports from the USA, one in every ten shipments of similar products from the same US processing establishment must be delivered to one of the Canadian establishments registered under the *Meat Inspection Regulations, 1990* for inspection of meat products imported from the USA, for inspection by a CFIA inspector.

Shipments of poultry (fresh or prepared) and fresh, chilled and frozen beef from non-NAFTA (North American Free Trade Agreement) countries usually require an import permit issued by the Department of Foreign Affairs and International Trade. ([Please see Section G for further information.](#))

Dairy Products

Butter, cheddar cheese, dry milk products and variety cheeses are regulated by the *Dairy Products Regulations* under the *Canada Agricultural Products Act*. Imported dairy products must comply with these regulations, which cover quality, labelling, packaging and grading, as well as health and safety. In addition, the *Health of Animals Act* restricts the importation of certain dairy products from countries where the presence of animal diseases poses a threat to Canadian agriculture and health. Most dairy products also require an import permit issued by the Department of Foreign Affairs and International Trade.

An *Import Declaration*, completed in duplicate, must accompany each dairy product shipment, indicating that the products were manufactured from sound raw materials and prepared under sanitary conditions, and that the products were sound and fit for human consumption at the time of shipment.

As of December 14, 2008, all cheese importers must hold a valid cheese import licence issued by the Canadian Food Inspection Agency in order to import cheese. At present, there is no federal requirement

for importers of other dairy products to be licensed. Product inspection may take place at the product's entry point or at its destination point, at the discretion of the Canadian Food Inspection Agency.

<http://active.inspection.gc.ca/tech/extsite.asp?url=http://laws-lois.justice.gc.ca/eng/regulations/SOR-79-840/index.html>

Eggs and Processed Eggs

Both shell and processed chicken eggs must meet the requirements set out in the *Egg Regulations* and *Processed Egg Regulations*, respectively, of the *Canadian Agricultural Products Act*. Shell eggs are destined for either the table market or breaking stock. Processed eggs are frozen egg, frozen egg mix, liquid egg, liquid egg mix, dried egg, dried egg mix and egg product, including all products consisting of 50 percent or more of egg.

These products may only be imported from a country with an inspection program and grade standards equivalent to Canada's. Shipments will be inspected upon entry into Canada and must be accompanied by inspection documentation issued by officials of the exporting country, certifying that the products conform to Canadian standards.

Both shell eggs and processed eggs require an import permit issued by the Department of Foreign Affairs and International Trade. In addition, the *Health of Animals Act* restricts the importation of eggs and processed eggs from countries where the presence of animal diseases pose a threat to Canadian agriculture and health. http://active.inspection.gc.ca/tech/extsite.asp?url=http://laws-lois.justice.gc.ca/eng/regulations/C.R.C.,_c._284/index.html

http://active.inspection.gc.ca/tech/extsite.asp?url=http://laws-lois.justice.gc.ca/eng/regulations/C.R.C.,_c._290/index.html

Eggs from different species of birds, balut eggs, and preserved duck eggs, are not subject to the Egg Regulations.

Fish and Fish Products

Fish and fish products are subject to the *Fish Inspection Act and Regulations*, which contain requirements for wholesomeness, labelling, packaging, grading, and health and safety.

Importers of fish and fish products must have an Import Licence issued by the Canadian Food Inspection Agency and must notify the closest Canadian Food Inspection Agency fish inspection office in writing each time they import fish. Restrictions apply to the importation of live or raw bivalve molluscan shellfish such as mussels, clams and oysters. Import permits may be required for certain types of cultured fish. Certain provinces may have additional requirements for the importation of live fish.

<http://active.inspection.gc.ca/tech/extsite.asp?url=http://laws-lois.justice.gc.ca/eng/acts/F-12>

All sturgeons are regulated by the *Convention on International Trade in Endangered Species (CITES)*. This means that all sturgeon, including their meat and caviar, require a CITES export permit from the exporting country. Some species also require a CITES import permit issued by Environment Canada.

Honey

Honey and honey products are regulated by the *Honey Regulations* under the *Canada Agricultural Products Act*. Imported products must comply with these regulations, which cover quality, labelling, packaging, grading, and health and safety requirements.

Each shipment of honey and honey products must be accompanied by an Import Declaration, Request for Release Approval and Customs Transaction Document. This documentation must be presented to the CFIA Import Service Centre for clearance before shipments are allowed entry into Canada by CBSA officers. The importer or the importer's authorized agent must declare that the honey meets the requirements of the *Honey Regulations*. This means that the honey was prepared under sanitary conditions, and is wholesome and fit for human consumption. All shipments of honey are subject to inspection at their destination point, by the Canadian Food Inspection Agency.

The Canadian Food Inspection Agency restricts the importation of honey from countries where the presence of animal diseases poses a threat to Canadian agriculture and health

http://active.inspection.gc.ca/tech/extsite.asp?url=http://laws-lois.justice.gc.ca/eng/regulations/C.R.C.,_c._287/index.html

<http://www.inspection.gc.ca/food/honey/eng/1299861393361/1303763748364>

Simulated Meat and Simulated Poultry Products

Simulated Meat and Simulated Poultry Products do not contain any meat or poultry, but have the physical and nutritive characteristics of meat or poultry. Consumers must not be misled as to the true nature of these products. Therefore, the complete common name **simulated (naming the meat or poultry)** should always appear in labels and in advertisements for these products.

The *Food and Drug Regulations* (FDR) [B.14.085 to B.14.088, B.22.029] specify the amounts of vitamins and mineral nutrients which must be added to simulated meat and poultry products. These added vitamins and minerals must then be declared as a percent daily value per serving of stated size in the Nutrition Facts table [B.01.402(7), table to B.01.402, item 14].

The term simulated must be included as part of the common name of these simulated products. The applicable phrase "**contains no meat**" or "**contains no poultry**" is also required on the principal display panel of the label, in close proximity to the common name and in letters of at least the same size and prominence as those used for the remainder of the common name of the product [B.01.100].

Meat and Poultry Product Extenders

"**Meat product extender**" means a food that is a source of protein and that is represented as being for the purpose of extending meat products [B.01.001].

"**Poultry product extender**" means a food that is a source of protein and that is represented as being for the purpose of extending poultry products [B.01.001].

Meat and poultry product extenders are subject to compositional requirements under the FDR with respect to protein, vitamin and mineral nutrient content [B.14.073, B.22.027]. These products are used to extend various meat or poultry mixtures to make products such as fresh sausage, cooked sausage, meat loaves, luncheon meats, etc

Extended Meat and Poultry Products

"**Extended meat product**" means a meat product to which a meat product extender has been added [B.01.001].

"**Extended poultry product**" means a poultry product to which a poultry product extender has been added [B.01.001].

Extended meat and poultry products must have approximately the same nutrient content as the product being extended [B.14.074 to B.14.079, B.22.028]. This is accomplished via the mandatory enrichment of the extender. For example, pork sausage extended with soy has, on a weight basis, approximately the same nutritive value as pork sausage that has not been extended.

Meat Products and Poultry Meat Products that Contain Phosphate Salts and/or Water

The FDR, B.01.090, B.01.091, B14.021, and B.22.012, establish composition and labelling requirements for meat products including poultry meat, to which phosphate salts and/or water have been added. These regulations establish minimum meat protein content and labelling requirements which enable consumers to make price and quality comparisons based on meat protein declarations. Compositional standards in both the FDR and the MIR, provide for the addition of phosphate salts and/or water to meats.

Products to Which Phosphate Salts and/or Water are Incorporated

Products to which phosphate salts and/or water are incorporated can be grouped into three categories. To facilitate the reading of this section these categories will be referred to as type 1, 2 or 3:

Type 1 - Solid cut meat product: A solid cut meat product is a whole cut of meat or a product consisting of at least 80% of pieces of boneless, skinless meat weighing a minimum of 25 g each, as determined prior to the addition of any other ingredient and further processing activities. This category includes products such as chicken wings, poultry carcasses, steaks, pork tails, tongues, picnics, certain hams, etc. [B.14.020, B.22.011]

Type 2 - Chopped, chopped and formed meat products: This category includes products, such as ground roast beef, ground ham and chicken breast (chopped and formed), that do not contain at least 80% of pieces of boneless, skinless meat weighing a minimum of 25 g.

Type 3 - Standardized prepared meat products and meat products which contain a filler: Specific minimum meat protein contents are prescribed in the MIR or in Divisions 14 or 22 of the FDR and reproduced in the table at the end of this Chapter.

Exemptions:

- a. Side bacon, Wiltshire bacon, salt beef and pork jowls are exempted from the minimum protein standard and the % meat protein label declaration described in [14.2 and 14.3 of this Guide](#) [B.01.092].
- b. Water absorbed by poultry carcasses during the post-slaughter chilling process is not considered to be an ingredient providing the amount of moisture picked up does not exceed the prescribed tolerances. However, when water is added as an ingredient to previously chilled poultry, the resulting product is subject to the minimum protein standard and the additional labelling requirements mentioned above.

Compositional Requirements [B.14.021, B.16.100 table 12, B.22.012]

- a. **Phosphate Salts:** The maximum level of phosphate salts that can be added to meat products is 0.5% of total added phosphate, calculated as sodium phosphate, dibasic. The addition of phosphate salts refers to the addition directly into the meat ingredient(s) by means of injection, pumping, massaging, tumbling, marination or mixing [B.14.021, B.22.012].
- b. **Meat Protein:**
 - **Solid cut meat product (Type 1):** Where phosphate salts and/or water are incorporated into a solid cut meat product, the minimum meat protein content of the product must, unless otherwise specified by regulations, be not less than 12% when cooked*; or not less than 10% when uncooked [B.14.021, B.22.012].
 - **Chopped and chopped and formed meat products (Type 2):** These products must, unless otherwise specified by regulations, contain not less than 12% meat protein when cooked, or, not less than 10% when uncooked.
 - **Standardized prepared meat products and meat products which contain a filler (Type 3):** The minimum protein content for standardized prepared meat products is specified in the MIR (Schedule I), or in Divisions 14 or 22 of the FDR.

Prepared meat products that contain a filler and for which no standard is prescribed in Schedule I, MIR, must contain not less than:

- a. 9.5 per cent meat product protein and 11 per cent total protein in the case of an uncooked product; or
- b. 11.5 per cent meat product protein and 13 per cent total protein in the case of a cooked* product [7, MIR].*

(* Cooked means that the product has been subjected to heat for a time sufficient to produce the characteristics of a cooked meat product with respect to friability, colour, texture and flavour.)

Common Name of Meats with Added Phosphates and/or Water

The identity of a meat product must appear on the label by its common name. When phosphate salts and/or water have been incorporated into a meat product, this addition must be reflected in the common name of the product, unless the product is cured or preserved or a standard is prescribed for it in Schedule I of the MIR.

As such, the common name of solid cut meat products must reflect the fact that they contain phosphate salts and/or water. The use of the term **seasoned** in conjunction with the product's name has been found to be acceptable when phosphate salts alone **or** with water are incorporated into a product. Similarly, the use of the term **seasoned** is also acceptable when spices are added with water. However, if **water alone** (i.e., water being the only non-meat ingredient) is added, then an expression such as **water added** shall be part of the product's common name.

A declaration of the minimum meat protein content as part of the Common Name:

The label of prepackaged Type 1 or 2 products must have a statement of the "**% meat protein**" as part of the common name of the product on the principal display panel of the package with no intervening material. The type must be at least as legible and conspicuous as any other type on that display panel, and in letters that are a minimum of half the size of the letters used in the rest of the common name of the product. The type height cannot be less than 1.6 mm in height [B.01.090(2)]. Declarations such as "**minimum meat protein xx%**" / « **protéines de viande minimums** » or "**meat protein xx%**" « **protéines de viande** » are acceptable.

Examples:

"Chicken Breast with water added, minimum xx% meat protein": In the case of a chicken breast to which "only water" has been incorporated.

"Seasoned Chicken Breast, xx% minimum meat protein": This common name would be appropriate to describe a chicken breast to which water and phosphate salts have been incorporated.

Ingredient List [B.01.008 (3)-(6), B.01.091]

Packaged at the manufacturing level:

Type 1, 2, and 3 meats that are packaged at the manufacturing level require an ingredient list on the label.

Packaged at the retail level:

An ingredients list is required when a Type 1 or Type 2 **uncured** meat product with added phosphates and/or water is packaged for retail sale by the retailer. The meat product may be cooked, sliced or cut up. Federally, Type 1 and 2 meat products that are cured do not require an ingredient list when packaged at retail. It is suggested that applicable provincial legislation be consulted.

Nutrition Facts Table

A nutrition facts table is required on meat and poultry with added phosphates and/or water whether packed at retail or packed at the manufacturer. The FDR exemption for raw single ingredient meats does not apply to meats with phosphates and/or water added. The percent meat protein declaration triggers the nutrition facts table, even if other exemptions apply, such as the less than 200 cm² available display surface or manufactured on premises [B.01.401(3)(e)(i)]. Refer to [Chapter 5](#) of this Guide for further information on these requirements

Summary Tables for Labeling Requirements

The following tables summarize the labelling requirements for foods packaged for retail sale by manufacturers and by retailers.

Labelling Requirements for Meat Products which Contain Phosphate Salts and/or Water (Prepackaged by the Manufacturer, Domestic & Imported)				
Category of Meat Product	% Meat Protein Content with the Name of the Product	Common Name must include addition of phosphate and/or water	List of Ingredients	Nutrition Facts table
Type 1: Solid Cut Meat Products (e.g., hams, roast)	Yes	Yes	Yes	Yes
Type 2: Non-Solid Cut Meat Products (i.e., ground, chopped and formed) (e.g., roast beef, chopped and formed)	Yes	Yes	Yes	Yes
Type 3: Products for which a minimum level of meat protein is prescribed in the MIR (Section 7 or Schedule I) or Division 14 or 22 of the FDR	No	No	Yes	Yes

The following table summarizes the labelling requirements for foods packaged from bulk on retail premises, domestic & imported.

Labelling Requirements for Meat Products which Contain Phosphate Salts and/or Water (Packed from Bulk on Retail Premises, Domestic & Imported)				
Category of Meat Product	% Meat Protein Content with the Name of the	Common Name must include addition of	List of Ingredients	Nutrition Facts Table

	Product	phosphate and/or water		
Type 1 and 2: Solid Cut Meat Products which are also cured, and may be cooked, sliced, or cut up	Yes	No	No	Yes
Type 1 and 2: Solid Cut Meat Products which are not cured and may be cooked, sliced, or cut up	Yes	Yes	Yes	Yes
Type 3: Products for which a minimum level of meat protein is prescribed in the MIR (Section 7 or Schedule I) or Division 14 or 22 of the FDR	No	No	No	Yes

Note: The labelling requirement of the minimum meat protein content is not required when:

1. a meat product containing phosphate salts and/or water is used as an ingredient in the preparation of another food; or
2. in cases where phosphate salts and/or water have not been incorporated into the meat ingredient(s) but are present in the food via the addition of a non-meat ingredient (e.g., a sauce, glaze, broth, marinade, etc.).

Phosphated Meat Products as Ingredients

3. When a meat product containing phosphate salts and/or water is used as an ingredient in the preparation of another food, the **common name** of this second generation meat product (the resulting product) does not have to reflect the fact that phosphate salts and/or water have been incorporated into the meat ingredient, nor does it require the declaration of % meat protein in the common name. However, the list of ingredients shall accurately describe the meat

ingredient(s) (e.g., seasoned chicken breast) and list the components of the ingredients, where required by B.01.009. [See examples of common names in 14.3 of this Guide.](#)

- The following table provides examples of common names and lists of ingredients for foods that have phosphated meats as ingredients.

Examples of Products Not Requiring Minimum% Meat Protein Information	
Product Name	Ingredient List
Pizza with Smoked Ham	Tomato sauce (tomato, water,...), ham (pork, water, salt, sodium phosphate, sodium nitrite...) etc.
Quiche Lorraine	Eggs, ham (pork, water, salt, sodium phosphate, sodium nitrite)
Chicken Salad	Lettuce, seasoned chicken (chicken, water, salt...)...
Chicken Sandwich	...seasoned chicken (chicken, water, sodium phosphate),...
Beef Fajita/Stir Fry Kit	...seasoned beef (beef, water, sodium phosphate),...
Glazed Chicken Wings	Chicken, glaze (water, gelatin,...sodium phosphate,...) ...

- While suppliers (meat packers or others) are not required to label shipping containers with percent protein declarations, it is their responsibility to provide this information to retailers. A good way to ensure retailers get this information is for the suppliers to make sure it appears on the label of **shipping containers**.

Compliance Policy for Protein Standards of Meat and Poultry Products Containing Phosphate Salts and/or Water

Tolerances for declarations of energy and nutrients in the Nutrition Facts table are described in the Compliance Test section found in Chapter 6 of this Guide.

The following compliance policy applies to:

the minimum meat protein standards for meat and poultry [MIR, 1990],

meat and poultry products to which phosphate salts or water have been added [B.14.021, B.22.012], and the labelling requirements for meat and poultry products to which phosphate salts and/or water have been added, [B.01.090, B01.091].

See 14.4.5 and the table to 14.5.2.2 of this Guide for more details on labelling requirements and minimum protein levels.

The purpose of the policy is to provide information on sampling plans and tolerances to help in the accurate labelling of meat products with added phosphate salts and/or water.

Principles:

1. It is the responsibility of industry to ensure that the food meets the protein composition requirements of the applicable regulations and that labelling information accurately reflects the nutrient content of the product.
2. Manufacturers should have good quality control of the formulation of the product to minimize variability.
3. Results obtained by following a sampling plan will help with verification of labelling information and formula control.

Sampling Plan

For the purpose of this section, lot and sample have been defined as follows:

A **lot** is a collection of primary containers or units of the same size, type and style produced under conditions as uniform as possible, with a common container code or marking or, if not code or marking, a day's production. In no case would more than a day's production be considered a lot.

A **sample** is the unit of analysis. It shall consist of five units selected randomly from a lot; the units may be composited and analyzed as a single sample, or may be analyzed individually and the results averaged.

Note 1: Bones, covering pork rind or a visible fat layer (i.e. subcutaneous fat or fat between the muscles) shall not be included in a sample used to determine meat protein content for the purpose of the minimum meat protein content [B. 14.021, B.22.012]. It is also not included in the main panel declaration of protein content [B.01.090].

A sample size of five consumer units is used in all cases. The sampling plan provides the option of either a composite sample or the average of individual samples. Either method will give values which are representative of the lot. Analysis of individual samples, however, will permit calculation of the nutrient variability from container to container.

The production lot should be properly sampled and analyzed by trained staff using recognized methods of measurement such as AOAC methods*. The analyst may determine how best to collect and analyze products in order to ensure accuracy of the declared values.

(* Official methods of analysis of the Association of Official Analytical Chemists, 16th Edition, AOAC, Arlington, Virginia 22209, U.S.A.)

Tolerances

Tolerances for protein/nutrient content are set at three levels:

- i. minimum meat protein content - equal to requirement
- ii. main panel per cent meat protein - 10 percent from label value

For the front panel statement of the % meat protein content as part of the common name, a 10% tolerance from label value is applied where the declaration is above the minimum level. This level balances the need for reliable values to allow consumers to make informed choices with the need for a technically achievable range. There may be significant variability in the protein content of meat and poultry products containing added phosphate or water as a result of variabilities in food manufacturing and processing systems and the inherent variability of protein in the food

Minimum Meat Protein Standard [MIR, 1990; B.14.021, B.22.012]

The lot is deemed to be out of compliance when the protein content of the sample (composite or mean) is less than the minimum meat protein requirement, **or** when a single unit is less than 90 percent of the minimum.

Percent Meat Protein Declaration (main panel as part of common name [B.01.090])

- a. Where the percent meat protein declaration is equal to **the minimum required protein level:**

A lot would be considered out of compliance if the meat protein content of the sample (composite or mean) is less than the minimum, or if a single unit is less than 90 percent of the minimum.

b. Where the declared percent meat protein is **greater than the minimum required protein level**:

A lot is considered to be out of compliance when the meat protein content of the sample (composite or mean) is less than 90 percent of the declared value. Meat protein content levels that are greater than the amount declared are acceptable, provided they are within good manufacturing practices

Meat Products for which a Minimum Meat Protein Content is Prescribed

Table 14-1

[MIR Schedule I; FDR, Divisions 14 and 22]

The following table provides the minimum meat protein level for specific products.

Column 1 Meat Product	Column 2 Minimum Meat Product Protein**
Meat*** Pattie	15% (uncooked)
Raw: Meat*** Balls Meat*** Burger Meat*** Chopette Meat*** Croquette Meat*** Cutlette Meat*** Steakette	11.5% (uncooked)
Cooked: Meat*** Balls Meat*** Burger Meat*** Chopette	13.5%

Meat*** Croquette Meat*** Cutlette Meat*** Steakette	
Flakes of Meat***	15%
Sausage (ready to eat) Salami Wiener Frankfurter Bologna Pepperoni Liver Sausage Liverwurst Mortadella Salametti Cervelat	9.5%
Blood Sausage	9.5%
Corned Beef	21% when enclosed in a hermetically sealed container
Meat*** Roll	15%
Tourtière	11.5%
Blood and Tongue Sausage	9.5%
Sausage Breakfast Sausage Dinner Sausage Sausage Meat	7.5% (uncooked)

Preserved Sausage or (if sodium or potassium nitrite or both, or sodium erythorbate or erythorbic acid are added) Cured Sausage	7.5% (uncooked)
Potted Meat*** Meat*** Paste Meat*** Spread Meat*** Paté	7.5%
Liver Paste Liver Spread Paté de Foie	7.5%
Meat*** Loaf Meat*** Lunch Luncheon Meat***	9.5%
Chopped Ham	12%
Creton	11.5%
Country-Style Creton	12%
Black Pudding Blood Pudding	9.5%

** Unless otherwise specified, the% meat protein is for products in the cooked state.

*** The word meat may be replaced by the name of the animal species or the cut of meat of the animal species.

<http://www.inspection.gc.ca/english/fssa/labeti/guide/ch14e.shtml>