

GUIDE TO FOOD LABELLING AND ADVERTISING

Chapter 14

Meat and Poultry Products

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Meat and Poultry Products

Note: Further labelling requirements for all meats, poultry meats and their products, produced in federally registered establishments and subject to the *Meat Inspection Regulations, 1990*, (MIR, 1990) are addressed in Chapter 7 of the *Meat Hygiene Manual of Procedures* available on the CFIA Web site: <http://www.inspection.gc.ca/english/anima/meavia/mmopmmhv/table7e.shtml>.

14.1 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 / poultry)**" should always appear in labels and in advertisements for these products.

The *Food and Drug Regulations* (FDR) [B.14.085 - 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].

14.2 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.

14.3 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 - 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.

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

The FDR, B.01.090, B.01.091, B.14.021, 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, 1990, 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 (or poultry meat): A solid cut meat (or poultry meat) is a whole cut of meat (or poultry meat) or a product consisting of at least 80% of pieces of boneless, skinless meat (or poultry 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” and “chopped & formed” meat products: This unstandardized 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, 1990 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.

14.4.1 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 & formed” meat products (Type 2): These unstandardized products should, 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, 1990 (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.)

14.4.2 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, 1990.

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.

14.4.3 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.

14.4.4 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.

14.4.5 Summary Tables for Labelling Requirements

- a) 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, 1990 (Section 7 or Schedule I) or Division 14 or 22 of the FDR	No	No	Yes	Yes

- b) 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 Product	Common Name must include addition of phosphate and/or water	List of Ingredients	Nutrition Facts Table
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, 1990 (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:

- (i) a meat product containing phosphate salts and/or water is used as an ingredient in the preparation of another food; or
- (ii) 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.).

14.4.6 Phosphated Meat Products as Ingredients

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 the 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**.

14.5 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.

14.5.1 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 analysed as a single sample, or may be analysed 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 analysed by trained staff using recognized methods of measurement such as AOAC methods. The analyst may determine how best to collect and analyse 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.)

14.5.2 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.

14.5.2.1 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.

14.5.2.2 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, 1990, Schedule I; FDR, Divisions 14 and 22

The following table provides the minimum meat protein level for specific products. Note that Column 1 and 2 repeat across the page.

Column 1	Column 2	Column 1	Column 2
Meat Product	Minimum Meat Product Protein**	Meat Product	Minimum Meat Product Protein**
Meat*** Pattie	15% (uncooked)	Sausage Breakfast Sausage Dinner Sausage Sausage Meat	7.5% (uncooked)
Raw: Meat*** Balls Meat*** Burger Meat*** Chopette Meat*** Croquette Meat*** Cutlette Meat*** Steakette	11.5% (uncooked)	Preserved Sausage or (if sodium or potassium nitrite or both, or sodium erythorbate or erythorbic acid are added) Cured Sausage	7.5% (uncooked)
Cooked: Meat*** Balls Meat*** Burger Meat*** Chopette Meat*** Croquette Meat*** Cutlette Meat*** Steakette	13.5%	Potted Meat*** Meat*** Paste Meat*** Spread Meat*** Paté	7.5%
Flakes of Meat***	15%	Liver Paste Liver Spread Paté de Foie	7.5%
Sausage (ready to eat) Salami Wiener Frankfurter Bologna Pepperoni Liver Sausage Liverwurst Mortadella Salametti Cervelat	9.5%	Meat*** Loaf Meat*** Lunch Luncheon Meat***	9.5%
Blood Sausage	9.5%	Chopped Ham	12%

Column 1	Column 2	Column 1	Column 2
Meat Product	Minimum Meat Product Protein**	Meat Product	Minimum Meat Product Protein**
Corned Beef	21% when enclosed in a hermetically sealed container	Creton	11.5%
Meat*** Roll	15%	Country-Style Creton	12%
Tourtière	11.5%	Black Pudding Blood Pudding	9.5%
Blood and Tongue Sausage	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.

