

## INS & OUTS OF INGREDIENT LABELING

### Collective Naming: It's the Exception, Not the Rule

FDA regulations require food labelers to list ingredients in descending order of predominance by weight in packaged foods. The name of an ingredient used in the Ingredient Statement must generally be a specific name and not a collective name. There are, however, several specific situations where collective naming is allowed. These include:

- Ingredients with established common or usual names – Worcestershire sauce, mustard and tomato sauce are widely established products and therefore the common name may be used for the combined ingredients followed by individual ingredients in parentheses.
- Ingredients with standards of identity – Bread, ice cream and French dressing all have standards of identity so listing individual ingredients in parentheses after the standard name is allowed.
- Milk products – Different forms of milk such as concentrated milk, reconstituted milk and dry whole milk can be combined and listed with the shortened name "milk" without any parenthetical ingredients. The same concept applies to different forms of skim milk, cream, whey and buttermilk.
- Egg products – Different forms of eggs such as dried whole eggs, frozen whole eggs and liquid whole eggs can be combined and listed with the shortened name "eggs" without any parenthetical ingredients. The same concept applies to egg whites and egg yolks.
- Fat and oils – These can be listed collectively when they are part of a blend, for example, vegetable oil (corn, canola and soybean oil).
- Fish protein ingredients in processed seafood products – This exception applies only when the manufacturer is unable to adhere to a constant pattern of fish species because of seasonal or other limitations of availability. For example, fish proteins (pollock, cod and/or pacific whiting).
- Wax and resin on fresh produce – These coating ingredients require specific wording to accompany the collective name, for example, coated with beeswax and/or lac-resin.
- Specific functional classes of ingredients can list the collective name in the Ingredient Statement followed by the individual types in parentheses. Examples include:
  - Leavening agents – Leavening (baking soda, monocalcium phosphate, calcium carbonate)
  - Yeast nutrients – Yeast nutrients (calcium sulfate and/or ammonium phosphate)
  - Dough conditioners – Dough conditioners (L-cysteine, ammonium sulfate)
  - Firming agents – Firming agents (calcium carbonate and/or calcium sulfate)
- Flavors, Spices & Colors – Many of these can be listed by a collective name, however there are important exceptions and caveats.

Food labelers wishing to use collective naming should consult all applicable sections of the Code of Federal Regulations, starting with 21CFR101.4 and 21CFR101.22.

NOTE: Companies often ask specific questions about how to list combinations of nuts, fruits, grains and juices in the Ingredient Statement. The regulations do not allow for collective ingredient labeling for ingredients like these, therefore, examples like the following are not allowed:

Nuts (almonds, peanuts, walnuts)  
Dried fruits (cherries, blueberries, raisins)  
Grain mix (oats, brown rice, quinoa)  
Fruit juice concentrates (apple, grape, cherry)

FDA watches collective naming carefully. Let us recall the FDA warning letter to KIND, LLC in 2015 citing that listing the collective terms "mixed nuts," "dried fruits" and "vitamins" as multicomponent foods and declaring the specific nuts, fruits and vitamins as sub-ingredients is not allowed.