

INS & OUTS OF INGREDIENT LABELING

Expanded vs. Composite Statements

In another Quick Reference on the Ins & Outs of Ingredient Labeling, we cover when ingredients can be combined in the ingredient statement. In short, ingredients with established common or usual names or standards of identity may be grouped by a single ingredient name followed by sub-ingredients in parentheses. For example: vegetable oil spread (water, soybean oil, palm kernel oil, salt, soy lecithin). This is the expanded approach.

There is another option for ingredient listing that is also compliant. Instead of declaring the common or usual name, the sub-ingredients may be incorporated into the overall ingredient listing in descending order of predominance. If any of those same ingredients are elsewhere in the formula, the sum (the "composite") must be used to determine the order of predominance in the finished product's ingredient statement. Using the above example, the sub-ingredients in the vegetable oil spread (water, soybean oil, palm kernel oil, salt, soy lecithin) can be combined with identical ingredients in the formula and listed separately in descending order in the finished product's ingredient statement, without the term "vegetable oil spread."

There are several advantages to using the composite approach:

- A shortened ingredient statement may be easier for consumers to understand.
- Combining the same ingredients from multiple sources may elevate key ingredients in the ingredient list, which could provide a benefit for marketing.
- Combining identical ingredients from multiple sources makes it more difficult for competitors to replicate the formula and enables a manufacturer to keep its recipes proprietary.

For the specific FDA requirements about composite ingredients in an Ingredient Statement, see 21CFR101.4.

NOTE: The composite method requires manufacturers to have information about sub-ingredients. In the vegetable oil spread example, the percentage amounts for each sub-ingredient will be necessary to determine where each ingredient fits in the overall ingredient statement. However, manufacturers may not know the percent breakdown of sub-ingredients – a limiting factor in using this approach. While ingredient suppliers will have the information for using the composite approach, they may be reluctant to share the details to protect their own formulas. Sometimes it's possible to get a range formula from an ingredient supplier that provides enough information to ensure that the ingredients in the finished food are listed in the correct descending order.