

INS & OUTS OF INGREDIENT LABELING

Ingredient Forms (dried, diced, roasted, fresh, etc.)

Diced? Dried? Roasted? Fresh? A tomato is not just "tomato" when it comes to food labeling. Understanding how to handle different forms of ingredients takes consideration of your formula, processing steps and consumer perception.

What form should an ingredient take in the ingredient statement? Regulations require that ingredients be listed by common or usual name in descending order of predominance in the ingredient statement. When ingredients are available in different forms, sometimes that form is an important piece of the common or usual name. If the finished product includes processing steps that modify the form of the ingredient, it may be misleading to include the form language.

Let's consider an example: a formula for tomato sauce calls for 2 lbs fresh roasted tomato (no sub-ingredients), 1 lb fresh diced tomato (no sub-ingredients), ½ lb canned diced tomato (with sub-ingredients) and ¼ sundried tomatoes (no sub-ingredients). To develop the ingredient list, consider the following questions:

- 1. Are there any processing steps that affect the ingredient form?** If the sauce is pureed and diced tomatoes are no longer visible in the finished sauce then identifying tomatoes as "diced" in the ingredient list is not appropriate. Likewise, if the sauce goes through a heat process, using "fresh" to describe the tomatoes is also not appropriate.
- 2. Can ingredients be combined? If so, what is the total weight?** In our example, the fresh and canned tomato ingredients can be combined and reflected in the list as one ingredient. The total weight of approx. 3.5 lbs would be used to determine the order of predominance in the formula. If you wish to provide information on the more premium nature of the roasted tomatoes, it would be acceptable to list roasted tomatoes as a separate ingredient in order of predominance, but this is not required. Because the common or usual name for sundried tomatoes is "sundried tomatoes," it is important to maintain its form and list it as such in the ingredient list in order of predominance.
- 3. What are the sub-ingredients and how much do they represent in the finished product?** Since the canned diced tomatoes included calcium chloride and citric acid as sub-ingredients, these must also be reflected in the ingredient statement. They can either be listed in order of predominance or a less than 2% statement could be used: "less than 2% of: calcium chloride, citric acid."

NOTE: There are two categories of ingredients that FDA specifically allows to be listed without the form, regardless of how they are used in the formula: milk products and egg products. That is, whether whole milk or whole egg is dry, frozen, reconstituted, concentrated or in liquid form, the shortened name "milk" or "eggs" can be listed in the ingredient statement without mention of the form. The same is true for other milk products, including skim milk, cream, whey and buttermilk and other egg products, including egg whites and egg yolks.

THE BOTTOM LINE: The goal with ingredient labeling is to be truthful and not misleading. If the form is an important part of the common or usual name for the ingredient, then it should be included in the ingredient statement.