# Fresh Meat On-Pack Nutrition Labeling Implementation Guide

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Introduction

This document is designed to provide guidance for the implementation of an on-pack nutrition labeling program for fresh meat products in the retail meat case. Information contained in this document will help guide a retailer through preparation and execution of a labeling program. The step-by-step process outlined has been used by many retailers to successfully launch their programs. Throughout this document examples are provided, and a resource section at the end provides contact information for scale, label and nutrition data experts as well as web site links to informative and important nutrition labeling information. The development of this document was funded by the beef checkoff. Contact information for NCBA's Retail Marketing Team (RMT) members can be found at www.beefretail.org/contactus.aspx.
A Team Approach to Implementation

It will take a team effort from both internal and external associates to implement an on-pack nutrition labeling program for your fresh meat program. Many questions need to be addressed:

- How will the program be executed?
- What technology support will be needed?
- What products will be labeled?
- What nutrition information will be used and where will it come from?
- What supporting point-of-sale materials will need to be developed?
- What kind of training is required?

Some of these questions can be answered within the meat department, but others will require insight and information from your Information Technology department, scale manufacturers or brokers, packer/suppliers, Retail Marketing Team (RMT), or State Beef Council (SBC) representative. Prior to moving forward, it is recommended that your meat team review this guide and identify additional individuals who need to be included in the process.

Action Steps:

- Review the implementation guide with retailer meat team to determine implementation steps and requirements.
- Contact additional support people and request involvement.
- Schedule a kick-off meeting to bring everyone up to speed, itemize required activities and make assignments.

Resources (page 19):

- On-Pack Nutrition Labeling Implementation Guide
- RMT or SBC representative to assist in organizing the program
How to Include Fresh Meat Nutrition Information at the Meat Case

The most reliable approach to getting accurate nutrition information on packages of meat is to include it on the scale label. Because each individual stock-keeping-unit (SKU) will require a nutrition label that contains nutritional information specific to that item, it will be imperative that the proper label be placed on each package of meat. By incorporating the nutrition information onto the scale label, the nutrition data will be tied directly to each SKU’s PLU or U.P.C. number in the scale management system’s database. This will ensure that each item receives the correct nutrition information. Including the nutrition information on the scale label will also provide customers with easy access to this information.

An alternative to incorporating nutrition information on a scale label is to develop individual labels for each SKU that are hand-applied before the products are stocked in the meat case. This option requires a significant amount of labor to execute and introduces the possibility for human error. For this reason, this option is not recommended.

Whether using the scale label or a separate hand-applied label, the nutrition information will be displayed on each label in a Nutrition Facts Panel (NFP) format.

![Standard Vertical Nutrition Facts Panel](image)

This format is mandated by the Food and Drug Administration (FDA) and the United States Department of Agriculture (USDA). Detailed specifications need to be followed in the development of the NFP. Links to these specifications can be found in the FSIS/USDA Electronic Code of Federal Regulations (see resource section).
If you choose to incorporate the NFP on your scale labels, you should contact your primary scale manufacturer or broker to discuss reformatting your labels to include the panel. The addition of the NFP will require you to reformat your current scale label. Depending on the size of your current label, you may also need to purchase and design a larger scale label. A label 2 ½" wide by 3 ¾" long will incorporate an NFP along with safety food handling information, net weight, unit price and total price information (see examples below).

Iron helps give you energy for daily activities. Beef is a good source of Iron.
Most scales purchased after 1998 can be programmed to print an NFP on the label. If you have scales that were made before 1998, you may need to have them replaced. Contact your scale vendor for more information on the printing capabilities of your scale models.

This beef checkoff-funded initiative has worked extensively with Hobart, Mettler Toledo and Digi to develop labels that incorporate an NFP. Contact information for these scale suppliers is included in the resource section.

**Action Steps:**

- Determine how the Nutrition Facts Panel will be applied to packages.
- If incorporated into the scale label, contact your scale vendor for assistance.
  - Have your vendor review your scale models to determine if they can print an NFP and the size of label required.
  - Have your vendor work with you to redesign your label to include an NFP.
- If applying a separate label, contact your label vendor and work to design labels.

**Resources (page 19):**

- Scale vendors
- Sample labels
What Products to Label

It is recommended that you begin this program with the goal of including an NFP on all meat department products. Most case ready or net weight products will already have an NFP included on the package if they are being shipped from a USDA inspected processing facility. This would include most, if not all, of your chicken and turkey products. You should plan to label all in-store processed variable measure products including beef, pork, lamb and veal. If you carry any exotic game like buffalo or emu that have a variable measure weight you should plan to label these products as well.

Ingredients added to cuts both in-store and by a supplier may pose a challenge with labeling. In order to label these items nutrition data must be included for the cut and any added ingredients. An ingredient statement must be included that itemizes all ingredients and amounts. If you add ingredients in-store (marinades, seasonings, etc.) you must obtain nutrition information from your ingredient supplier and include that information on the label. For products that are purchased from your supplier with ingredients already added, we recommend that you ask your supplier to begin labeling these items with nutritional information. If that is not possible, nutritional information can be developed for these items provided all the proper data is available.

Many retailers offer both full and self service programs in their meat departments. It is highly recommended that all products in both programs be labeled with nutritional information. If any supporting educational materials will be used to introduce the new nutrition labeling program to your customers and nutrient claims are made (see section on Consumer Education for more information), all products for which claims are made will be required to carry an NFP on their package.

Action Steps:

- Plan to develop nutrition labels for all variable measure fresh beef, pork, veal and lamb products.
- Identify any other products in the meat department that do not currently carry a nutrition label and develop nutrition information for them.
- Request ingredient statements from all suppliers of products that contain a mixture of ingredients and do not currently carry a nutrition label, or require suppliers of these products to include an NFP on their products.
- Plan to label all products in both the full and self service programs.

Resources (page 19):

- Protein Database for On-Pack Nutrition Labeling
- Suppliers of ingredient items
**What Nutrition Information Should Be Included**

Government regulations require that very specific information be included on an NFP. The format for an NFP can vary based on the amount of space you have to display it on the package. Some alternatives are tabular and vertical labels.

### Tabular (Horizontal) Nutrition Facts Panel

<table>
<thead>
<tr>
<th>Nutrition Facts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Serving Size 4 oz (112g)</td>
</tr>
<tr>
<td>Servings Per Container varied</td>
</tr>
<tr>
<td>Amount Per Serving</td>
</tr>
<tr>
<td>Calories 190</td>
</tr>
<tr>
<td>% Daily Value*</td>
</tr>
<tr>
<td>Total Fat 9g</td>
</tr>
<tr>
<td>Saturated Fat 3.5g</td>
</tr>
<tr>
<td>Cholesterol 45mg</td>
</tr>
<tr>
<td>Sodium 65mg</td>
</tr>
<tr>
<td>Total Carbohydrate 0g</td>
</tr>
<tr>
<td>Protein 25g</td>
</tr>
<tr>
<td>Iron 10%</td>
</tr>
<tr>
<td>Riboflavin 10%</td>
</tr>
<tr>
<td>Vitamin B6 35%</td>
</tr>
<tr>
<td>Zinc 30%</td>
</tr>
<tr>
<td>Not a significant source of dietary fiber, sugars, vitamin A, vitamin C, and calcium.</td>
</tr>
</tbody>
</table>
| *Percent Daily Values are based on a 2,000 calorie diet.

### Vertical Nutrition Facts Panel

<table>
<thead>
<tr>
<th>Nutrition Facts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Serving Size 3 oz (85g)</td>
</tr>
<tr>
<td>Calories 172</td>
</tr>
<tr>
<td>*Percent Daily Values are based on a 2,000 calorie diet.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Amount Per Serving</th>
<th>% Daily Value*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Fat 7g</td>
<td>11%</td>
</tr>
<tr>
<td>Saturated Fat 3g</td>
<td>15%</td>
</tr>
<tr>
<td>Cholesterol 76mg</td>
<td>25%</td>
</tr>
<tr>
<td>Sodium 56g</td>
<td>2%</td>
</tr>
<tr>
<td>Iron 16%</td>
<td>Thiamin 7%</td>
</tr>
<tr>
<td>Riboflavin 15%</td>
<td>Niacin 18%</td>
</tr>
<tr>
<td>Not a significant source of dietary fiber, sugars, vitamin A, vitamin C, and calcium.</td>
<td></td>
</tr>
</tbody>
</table>

More information on these alternative labels can be found in the resource section of this document.

In 2002, the beef checkoff funded an on-pack nutrition labeling initiative at retail in an effort to proactively educate customers about the nutritional value of beef products. A key factor in the success of this initiative was to include micronutrients on the label that are most relevant to customers when shopping for meat products.
Nutrients like fiber, sugars, calcium and vitamins A and C are only found in very small traces, if at all, in meat products (see “Not a Significant Source” statement in label below). Labeling regulators have allowed these product-specific non-relevant nutrients to be designated to a “Not a Significant Source” statement on the label in order to make room for more relevant nutrients. It is recommended that fiber and sugars be included in this statement if label space is limited. It is also recommended that zinc and vitamins $B_6$ and $B_{12}$ be substituted for calcium and vitamins A and C because of their abundance in meat products. If room allows, you should also consider including niacin, thiamin and riboflavin which are also found in significant amounts in meat products.

**Action Steps:**

- Determine label format based on space available.
- Determine if a “Not a Significant Source” statement will be used to allow for the inclusion of more relevant nutrients.

**Resources (page 19):**

- Alternative label formats document
- Label samples
Developing Product Nutrition Information

The beef checkoff has funded the development of a nutrient database for all variable measure meat products including beef, pork, veal and lamb. The database is based on nutrition information in the USDA’s National Nutrient Database for Standard Reference. It is a work in progress, and the information contained within it depends on when new items are added and need to be assigned nutritional information. This searchable database, the Protein Database for On-Pack Nutrition Labeling, is available to retailers and suppliers to use when developing NFPs and can be found at www.beefretail.org/OPNLdatabase.aspx.

The database contains a broad list of products and the nutritional information required for the NFP. The standard measure for nutrition calculations is a 4 oz/112g serving. In addition to the required nutrients, each item contains information on key supplemental nutrients including zinc, vitamin B₆, vitamin B₁₂, niacin, thiamin and riboflavin.

The nutrition numbers in the beef checkoff-funded database may show some slight differences to those that would be obtained if using the USDA Nutrient Database. The database incorporates a 20% tolerance based on fat that current labeling regulations allow. This allowance helps to cut down on the number of labels required for meat department items because cuts with similar fat content (within the 20% allowance) can carry the same NFP.

Another difference in the USDA nutrient database is that its nutrient calculations are based on 100 grams. This program is based on 4 ounces or 112 grams, which is the recommended serving size for a raw cut of fresh meat. The 100 grams used by the USDA is a standard serving amount used for many foods, but when dealing with fresh meat products a more realistic serving amount is 4 ounces or 112 grams.
Individual product nutrition information is also available in the USDA’s nutrient database (www.nal.usda.gov/fnic/foodcomp/search/). If you have a dietician on staff who is familiar with this database, he or she can develop a fresh meat nutrient database for you. If you need further assistance in assigning nutrient data to your meat products, you may need to identify a person specializing in working in this field. One example is Judy Quick, the individual who developed the composite labels for the Protein Database for On-Pack Nutrition Labeling. Her contact information can be found in the resource section.

As you prepare to have your products assigned nutrition information, you will need to identify grade and trim levels for all beef and pork products. You should use the specifications outlined in your programs’ specifications manual. If you offer a high select/low choice program, you will need to default to a choice grade because regulations require you to always default to the grade with the higher fat content. Ingredient items will need to take into account all ingredients included, so a complete list of ingredients and the quantity used will be required.

Once data are complete, it will need to be loaded into your in-store scales. Talk with your IT department and/or your scale vendor for support in getting this accomplished. If you use scale management software, the data should be able to be downloaded to your scales. If not, you may need to upload the information to each scale on an individual basis. Be sure to load the information in all meat scales, including both the self and full service departments. You should then run a test on some labels in a sample of stores to make certain all information is printing properly.

**Action Steps:**

- Determine how you will secure your fresh meat nutrition information:
  - Use the Protein Database for On-Pack Nutrition Labeling.
  - Use the USDA’s National Nutrient Database.
  - Contact a nutrition specialist for assistance.
- Identify grade and trim levels for beef and pork.
- Secure ingredient statements from suppliers.
- Download a nutrient database to all scales.
- Run test to ensure nutrient information is printing properly.

**Resources (page 19):**

- Protein Database for On-Pack Nutrition Labeling
- Judy Quick
- USDA National Nutrient Database
Dual Declaration Labels for Ground Beef

The beef checkoff funded the development of dual declaration labels for use on all ground beef products (see sample label below). These labels are available through Yerecic Label (contact information in resource section). The NFPs on these labels provide customers with nutritional information for both raw and cooked (pan-browned) product. Current labeling regulations require that nutrition information be displayed based on the raw product. The information in the dual declaration label provides customers with the nutritional facts for a serving of ground beef based on how they would consume it – in a cooked form.

Beef checkoff-funded research\(^1\) shows that consumers quickly become aware of the availability of this information and recognize the difference in the raw versus cooked information. When developing your fresh meat nutrition program, you should consider including these dual declaration labels particularly if you are already on an Easy Fresh Cooking Label\(^\circledR\) program.

**Action Steps:**
- Determine whether or not you will use dual declaration labels for ground beef.
- If yes, contact Yerecic Label to discuss.

**Resources (page 19):**
- Yerecic Label

\(^1\) The Beef Checkoff, Nutrition Labeling Research, 2006
Consumer Education

A new on-pack nutrition labeling program for fresh meat offers an opportunity to promote to your customers that you have heard their request for additional nutrition information and are responding. It will be important to take this opportunity to spotlight the new program with POS materials that make your customers aware of the new NFP on each meat package as well as educate them on the important nutrients that fresh meat provides.

Since all meat packages in the meat department will include an NFP, you can now include nutrient claims on POS to assist in your customer education process. Claims like “Beef is an excellent source of protein” and “Beef is an excellent source of zinc to help your body fight colds and flu” will provide customers with nutrition information at the point of sale that should provide them with additional reasons to purchase fresh meat products. The beef checkoff funded the development of a list of nutrient and structure/function claims that have been reviewed by the USDA for your use. Information on where to find these claims can be found in the resource section of this document.

The beef checkoff-funded consumer intercept research\(^1\) with a representative sample of consumers at the meat case with one retail partner to measure the impact that the nutrition program and supporting POS materials were having on awareness and behaviors. The results of this research showed that the program and supporting materials can build awareness, provide valuable nutrition education and increase customer loyalty.

- 25 percent of consumers were aware of the on-pack nutrition labeling program.
- 33 percent of respondents were able to recall messaging stating that beef is an excellent source of protein; 33 percent recalled that cooked ground beef is lower in fat that uncooked (from the ground beef dual declaration labels); 25 percent were able to state that beef is a good source of iron, zinc and many B-vitamins.
- After receiving the POS messaging over a 16-week test period, 45 percent of consumers rated beef as “Very Healthy”, up 9 percentage points from pre-launch numbers (a significant increase).
- 52 percent of consumers said they now believe beef either might be or is healthier than they did before they received the nutritional information that supported the new nutrition program, a 45 percentage point increase (significant).
- 34 percent of consumers said they would be either somewhat or much more likely to select a store to shop in based on the availability of nutrition information, a 15 percentage point increase (significant).

\(^1\) The Beef Checkoff, Nutrition Labeling Research, 2006
The Retail Marketing Team has worked with a number of retailers developing POS pieces to support the launch of a new on-pack nutrition labeling program. Following are some examples of posters designed to make customers aware of the NFP and the micronutrients that are the focus of additional POS messaging.

Additional POS provides nutrient claim information to educate customers on the important nutritional benefits fresh meats provide and the potential benefits from consuming meat products that provide these nutrients.
Templates are available for these and other POS materials. They are available at [www.beefretail.org/resoNutritionPOS.aspx](http://www.beefretail.org/resoNutritionPOS.aspx). You may also want to contact your RMT or SBC representatives for assistance in developing your own supporting POS.

Beyond building awareness for your new fresh meat nutrition labeling program at the meat case, you will also want to promote the program in your weekly ad flyer and on your in-store public address system. Following are some examples of how some retailers have promoted their new nutrition labeling programs in their weekly ads.

**Action Steps:**
- Develop POS to build awareness to support your new on-pack nutrition labeling program and educate customers about nutrition benefits of meat.
- Tie messaging in with announcements in your weekly ad flyer and over the PA system.

**Resources (page 19):**
- List of Nutrient and Structure Function Claims
- POS examples and templates
- RMTs and SBCs
Staff Training

Once a new on-pack nutrition labeling program is established for the meat department and before rolling it out to all stores, corporate and in-store staff need to be educated about the program. It will be important that staff know all the details about the program and are confident in promoting and explaining it to their customers.

It is recommended that a training manual be developed that highlights key elements of the program and provides talking points and nutrition information to share with customers. A sample of a training manual can be found at www.beefretail.org/uDocs/opnlsampletrainingmanual.pdf.

The most effective way to conduct training for this program is to bring all staff together. If this is not practical, bringing at least the meat department managers together for training will provide them with the information and tools needed to train the balance of their staff in-store.

An important part of this training will be the proper execution of all POS to support the program. Make certain all stores have a complete kit for display. If possible, set up a test store and take pictures of a proper implementation that can be shared with all stores as a prototype. We also recommend that stores be regularly audited during the first few months of program execution to ensure that all POS is up and that the program is being executed properly. These audits will provide an opportunity to answer any staff questions and secure additional information for in-store support if necessary.

Action Steps:

- Develop training manual.
- Set up prototype store and photograph to use as template.
- Organize training session.
  - If all associates are not available, train meat managers to train associates.
- Audit stores regularly to ensure proper execution.

Resources (page 19):

- Training manual sample
- Nutrition information for staff and consumer education
Summary Steps for Implementation of an On-Pack Nutrition Labeling Program

1. Make a commitment to the program.

2. Organize internal implementation team, including meat, IT and advertising/marketing.

3. Identify outside support, including RMT/SBC, scale vendors (manufacturer or broker), product suppliers, etc.

4. Review current scale label and work with scale support people to incorporate Nutrition Facts Panel.

5. Assign nutrition information to all products in the fresh meat case.

6. Develop POS and advertising support to make customers aware of the program and educate them on meat’s nutritional benefits.

7. Train staff to educate customers on the new nutritional information.

8. Roll program out to all stores.

9. Update POS and advertising support periodically.
Resources:

- Contact your Retail Marketing Team or State Beef Council representative at www.beefretail.org/contactus.aspx
- Additional information is available on www.beefretail.org/nutrition.aspx
  - Protein Database for On-Pack Nutrition Labeling
  - Sample Labels
  - Sample POS Materials and Templates
  - List of Nutrient and Structure Function Claims for POS
  - Sample Training Manual

Scale Vendors:

Kathleen Bodenlos
Sales Development Manager
Hobart
701 Ridge Avenue
Troy, OH 45374-0001
P: (937) 332-2059
E: kathleen.bodenlos@hobartcorp.com
www.hobartcorp.com

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11001 Bren Road East
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1900 Polaris Parkway
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http://us.mt.com
Nutrient Data Development:
Judy Quick
Quick & Associates
13944 Roberts Road
Hancock, MD 21750
P: (301) 678-5737
E: quick.and.assoc@hughes.net

USDA’s National Nutrient Database for Standard Reference
www.nal.usda.gov/fnic/foodcomp/search/

Label Company:
Rich Thoma
Vice President, Sales
Yerecic Label
201 Hunt Valley Rd.
New Kensington, PA 15068
P: (724) 335-2200
E: ThomaR@yereciclabel.com
www.yereciclabel.com

FSIS/USDA Electronic Code of Federal Regulations (e-CFD):
Animal and Animal Product
http://ecfr.gpoaccess.gov

Part 317 – Labeling, Marking Devices and Containers
http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=13dbdcd70bb1e4e2cbdda953f90afa76&tpl=/ecfrbrowse/Title09/9cfr317_main_02.tpl

Subpart B – Nutrition Labeling
http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=5040787e8784291b54a4b9ace9326f38&rgn=d6&view=text&node=9:2.0.2.1.18.2&idno=9

Part 374.309 – Nutrition Label Content – Red Meat
http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=5040787e8784291b54a4b9ace9326f38&rgn=d8&view=text&node=9:2.0.2.1.18.2.22.6&idno=9

Part 381 – Poultry Products Inspection Regulations
http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=13dbdcd70bb1e4e2cbdda953f90afa76&tpl=/ecfrbrowse/Title09/9cfr381_main_02.tpl

Part 381.409 – Nutrition Label Content – Poultry
http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=406ffcdba2e1a57d813a25b9d2d8f22a&rgn=div8&view=text&node=9:2.0.2.1.35.24.70.6&idno=9