



Labeling Syrup in West Virginia

Acroynms

- CFR-Code of Federal Regulations
- FPLA-Fair Packaging & Labeling Act
- PDP-Principal Display Panel (portion of the package that is most likely to be seen by the consumer when on a store shelf)

Basic Labeling Components for Maple Syrup*

- Statement of Identity
- Net Quantity of Contents
- Ingredient List
- Statement of Responsibility

*Note—these are the requirements are FDA requirements for all products engaged in interstate commerce. Examples would include sales to retail chains, Tamarack, online sales/web shopping for shipping.

Statement of Product Identity

- The Statement of Identity is the name of the food
- The name must be the common or usual name of the food
- This name shall accurately identify or describe the basic nature of the food or its characterizing properties or ingredients
- Foods that have a Standard of Identity must conform to all requirements of the standard
- This is one of the required components that must appear on the principal display panel

Reference: CFR 21, Part 101.3

Source: Ohio Department of Agriculture Division of Food Safety “Maple Syrup” Fact Sheet—UPDATED—July 2019

DATE

APR 2020



EXTRA DARK

MAPLE SYRUP

25 MAIN ST, HERMON, VT

750 ml (25.4 ounces)

on ribs, sausage, bacon, salmon, oatmeal, or vanilla ice cream

Net Quantity of Contents

- The term “Net” or Net Contents” may be used when state the Net quantity of contents in terms of volume
- The term “Net Weight” or “Net Wt” must be used when expressing net quantity of weight
- Do not include packaging weight
- When distributed or sold of the site of production, the net quantity of contents shall be declared in both the U.S. Customary System and the International System (metric)
- The metric declaration is state parenthetically; in parentheses)
- The net quantity of contents statement must be in the bottom 30 percent of the principal display panel and aligned parallel to the bottom of the package
- This is one of the required components that must appear on the principal display panel

Reference: CFR 21, Part 101.7; FPLA, Title 15-Chapter 39, 1453(a) (2)

Source: Ohio Department of Agriculture Division of Food Safety “Maple Syrup” Fact Sheet—UPDATED—July 2019

Note: Liquid maple syrup weights more than water; you must convert to metric based on the actual product weight



Ingredient List

- Most food products are required to have an ingredient list
- The list must declare all ingredients by common or usual name
- The list must appear in descending order by weight
- Maple syrup is often a single ingredient food (if not, see notes about value-added foods)
- An ingredient list for maple as a **single ingredient food** is not required EXCEPT when using optional ingredients such as salt and chemical preservatives

Reference: CFR 21, Part 101.4

Source: Ohio Department of Agriculture Division of Food Safety “Maple Syrup” Fact Sheet—UPDATED—July 2019

Swap It - Syrup



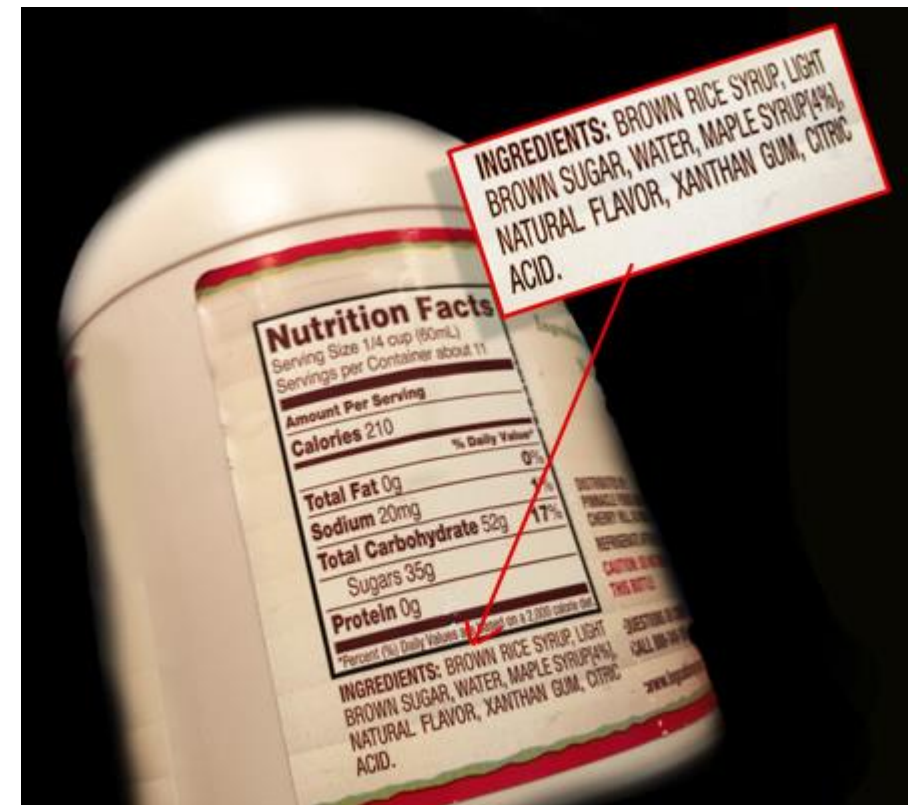
Ingredients:

Corn Syrup, Liquid Sugar (Natural Sugar, Water), Water, Salt, Natural and Artificial Flavor (Lactic Acid), Sodium Hexametaphosphate, Preservatives (Sodium Benzoate, Sorbic Acid), Caramel Color, Phosphoric Acid.

The Approachable Home @_michelle_annett_

Ingredients:

Maple Syrup



Statement of Responsibility

- Shall include:
 - Business name
 - Street address
 - City, State, Zip Code
- Must be continuous.....can't be split up into different areas of the label
- If the business name is listed in the phone directory, street address can be omitted
- Marketing thought—telephone numbers, web-site address and e-mail addresses are permitted but not required; how can a customer reorder your product?

Reference: CFR 21, Part 101.4

Source: Ohio Department of Agriculture Division of Food Safety "Maple Syrup" Fact Sheet—UPDATED—July 2019



Intrastate Commerce v. Interstate Commerce

Intrastate Commerce

-Business Transaction (or transportation) that occur solely within a particular state's borders

Example: Direct sales of maple products at Maple Days

Interstate Commerce

-Business Transaction (or transportation) that occur between a seller located in one state and a buyer located in a different state

Example: Online sales shipped to a customer in another state

West Virginia Farmers' Market Vendor Guide

- Labeling requirements:
 - Different for potentially hazardous and non-potentially hazardous food products
- 2023 manual:
<https://agriculture.wv.gov/wp-content/uploads/2023/02/Farmers-Market-Vendor-Guide.pdf>
- See page 5 for note about net weight statement specific to maple syrup; page 9 for tree syrups

Farmers Market VENDOR GUIDE



Value-Added Products

- Change of form through processing of a food product
- Includes sap to maple syrup, however, non-potentially hazardous product based on high sugar
- Maple sugar, cotton candy, crème, candy etc. are processed maple syrup products
- If maple is the only ingredient, still non-potentially hazardous
- ANY other ingredient and form change require a determination of hazard level at both the state and federal level
- Label requirements still apply (home-based and interstate commerce)
- Distribution method (direct, on-farm etc) determine inspection, food manufacturing status and risk standards
- **COMING SOON---Future Generations University will be developing tools and resources to enter the maple value-added “world”**

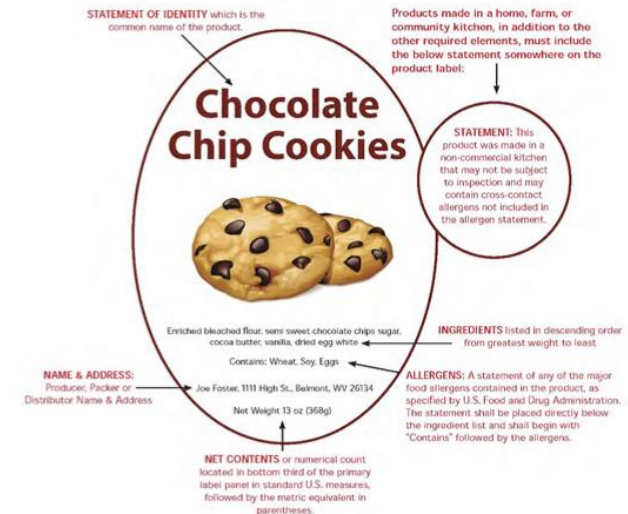
Apple Butter, Sorghum, Molasses and Tree Syrups

Due to the high sugar content and the high temperature of the product when it is jarred, such products are considered to be non-potentially hazardous.

Fruit butter is a smooth and creamy spread that is created by slow-cooking fruit and sugar until it reaches the right consistency. These types of spreads are not always translucent and are often opaque. Pumpkin butter is not considered a fruit butter.

Products that contain additional ingredients (i.e. peppers, nuts, infused vinegars, artificial sweeteners or added fruit juice or oils) are not included in this provision. They fall under the 'Potentially Hazardous' category. These items need additional analysis to determine their salability at WV markets.

PRODUCTS MADE IN A HOME, FARM OR COMMUNITY KITCHEN (see below)



<https://agriculture.wv.gov/wp-content/uploads/2023/02/Farmers-Market-Vendor-Guide.pdf>