

## **United States** Department of Agriculture

**DATE:** July 23, 2009

Food and Nutrition Service

**MEMO CODE:** TA 04-2009

3101 Park

Child Nutrition (CN) Labeling Program Participants

Center Drive

22302-1500

Alexandria, VA

FROM: Cynthia Long

Director

Child Nutrition Division

**SUBJECT:** 

TO:

Implementation of Quality Control (QC) Monitoring for CN Labeling Program

All manufacturers participating in the CN Labeling Program are required to have an Agricultural Marketing Service (AMS) or National Marine Fisheries Service (NMFS)-approved QC Program by October 1, 2009. Any product manufactured and labeled with the CN label after October 1, 2009, without an approved QC Program in place will be considered as produced in violation of CN Labeling Program requirements. The Food and Nutrition Service (FNS) in coordination with AMS and/or NMFS will issue violation notices to all CN Program stakeholders.

The two attached 2008 notices to industry regarding these mandatory QC requirements included a tentative implementation date of spring 2009. Once it was established that the mandatory QC requirements would be implemented by October 1, 2009, FNS began issuing temporary approvals for production through October 1, 2009.

In order to obtain an FNS temporary or final approval for production after October 1, 2009, manufacturers are required to attach the plant specific AMS or NMFS-approved QC Coversheet to all CN label applications. Please refer to the Standard Operating Procedure for Submitting and Approving QC Programs for CN Labeled Products published at the CN Labeling Program website. CN label applications submitted after October 1, 2009, without the AMS or NMFS documentation of QC approval will be returned to the manufacturer without review.

Manufacturers may request an AMS or NMFS Letter of Intent when they submit their OC Program for review. However, the Letter of Intent is not acceptable documentation of an approved QC Program. A label application submitted with a Letter of Intent after October 1, 2009, will receive an "FNS DRAFT" at best. Manufacturers are not authorized to produce CN labeled products with an "FNS DRAFT" review stamp.

Manufacturers that maintain label applications with any of the following FNS approval stamps regardless of expiration date will be considered in violation of program requirements if the approved label is placed on product manufactured after October 1, 2009, without an AMS or NMFS-approved QC Program in place:

FNS FINAL APPROVAL - (date of final) Authorized only for production after this date and at this plant location. Application must be resubmitted every five years to maintain final approval or CN number will EXPIRE on: (expiration date after 10/1/2009)

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FNS Approval Stamps issued prior to September 1, 2007 (these Final Approvals expire on September 1, 2012):

FNS APPROVED IN FINAL

## **FNS TEMPORARY APPROVAL**

As updates and resources for the CN Labeling Program become available, they will be posted at the CN Labeling Program website under the heading CN Labeling Program Updates at: http://www.fns.usda.gov/cnd/cnlabeling/.

If you have any questions regarding the CN label application process, please do not hesitate to call the FNS-CN Labeling Program office at 703-305-2609. All questions regarding the QC Program approval process should be directed to the AMS-CN Labeling Program Operations Office at 202-720-9939.

Sincerely,

Original Signed

CYNTHIA LONG
Director
Child Nutrition Division

Attachments



## United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive

Alexandria, VA 22302-1500 DATE: August 28, 2008

TO: Child Nutrition (CN) Labeling Program Participants

FROM: Cynthia Long

Director

**Child Nutrition Division** 

SUBJECT: Updated Industry Guidelines for Preparation of Quality

Control (QC) Program

As discussed in our July 1, 2008 memorandum to all CN Labeling Program Participants, all manufacturers participating in the CN Labeling Program are required to have an approved QC Program (Appendix C in 7 CFR 210, 220, 225, 226). Beginning in spring 2009, all QC Programs will be required to comply with the Food and Nutrition Service (FNS) requirements for production of CN labeled products. In addition, the Agricultural Marketing Service (AMS) will oversee plant inspections and QC Program approvals (excluding seafood). The National Marine Fisheries Service (NMFS) will continue to oversee inspections and QC Program approvals of seafood products.

AMS, NMFS, and FNS have updated the *Industry Guidelines for Preparation of Quality Control Programs for Meat, Poultry, Seafood and Non-meat CN Labeled Products.* A copy of this document has been posted to the CN Labeling website at: <a href="http://www.fns.usda.gov/cnd/cnlabeling/">http://www.fns.usda.gov/cnd/cnlabeling/</a>. In addition, a description of the verification services provided by AMS and NMFS for this program is also posted to the website. Questions related to these guidelines or services should be directed to Gwendolyn Holcomb at <a href="mailto:gwendolyn.Holcomb@usda.gov">Gwendolyn.Holcomb@usda.gov</a> or phone (202)-720-6042.



CYNTHIA LONG Director Child Nutrition Division



## United States Department of Agriculture

DATE: July 1, 2008

Food and Nutrition Service

**MEMO CODE: TA 05-2008** 

3101 Park Center Drive TO: Child Nutrition (CN) Labeling Program Participants

Alexandria, VA 22302-1500 FROM: Cynthia Long

Director

Child Nutrition Division

SUBJECT: Changes to Quality Control Monitoring for CN Labeling Program Manufacturers

This is to inform you of upcoming mandatory changes to quality control monitoring for Child Nutrition (CN) labeled products. These changes are designed to ensure integrity and equitable oversight of products in the U.S. Department of Agriculture's (USDA) CN Labeling Program. The Agricultural Marketing Service (AMS) will assume the responsibility of monitoring the production of meat, poultry, and non-meat products. AMS oversight for meat, poultry, and non-meat products will be mandatory to continue participating in the CN Labeling Program. AMS monitoring services will only cover Food and Nutrition Service (FNS) requirements for quality control. Meat and poultry establishments under Federal inspection must still meet regulatory requirements of the USDA, Food Safety and Inspection Service.

This plant oversight program will be similar to the fee for service system that has always been in place for CN labeled products inspected by the U.S. Department of Commerce's (USDC) National Marine Fisheries Service (NMFS). Products produced under USDC's NMFS will continue to be inspected and charged by USDC. This plant oversight system will bring the CN Labeling Program into compliance with the FNS requirement that all CN labeled products are to be Federally inspected by USDA or USDC in accordance with an approved quality control program or standards established by the appropriate Federal inspection service (7 CFR 210 Appendix C 4.(b)).

Beginning in fall 2008, AMS will provide guidance to meat, poultry, and non-meat CN label manufacturers to modify existing QC programs to ensure that they meet the minimum requirements identified in the *Industry Guidelines for Preparation of Quality Control Programs for Meat, Poultry, Seafood, and Non-meat CN Labeled Products*. The QC guidance and assistance provided by AMS during this time will not be charged.

Beginning in spring 2009, all QC programs will be required to be in compliance with FNS requirements. In addition, AMS will begin in-plant inspections to monitor the production of CN labeled products according to AMS approved QC programs. AMS will charge plants for QC program review and inspection at this time.

The QC guidelines are currently being updated by AMS, USDC and FNS. Once the guidelines are complete, they will be distributed to all CN labeling manufacturers in order for the quality assurance managers to begin reviewing and/or modifying their current QC programs accordingly to meet CN Labeling Program requirements. As updates for the CN Labeling Program are

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available, they will be posted at the CN Labeling Program website under the heading **CN Labeling Program Updates** at: <a href="http://www.fns.usda.gov/cnd/CNlabeling/default.htm">http://www.fns.usda.gov/cnd/CNlabeling/default.htm</a>. If you have questions regarding this process, please contact AMS at 202-720-6042 or FNS at 703-305-2609.

Sincerely,

Original Signed

CYNTHIA LONG Director Child Nutrition Division