

## CHANGE TRANSMITTAL SHEET

Retained Water In Raw Meat and Poultry Products	6700.1 Amend. 1	1/7/2003
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### I. PURPOSE

This change transmittal issues revisions to questions 12 and 13 on Attachment 1. The revisions are necessary to provide further clarification to inspection program personnel about product for export.

### II. CANCELLATION

This transmittal is cancelled when contents have been incorporated into FSIS Directive 6700.1.

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### FILING INSTRUCTION

Remove Old Pages

9 and 10

Insert New Pages

9 and 10

11. Does the regulation apply to intermediate (in-process) processing steps?

Answer: No. The regulation focuses on the labeling of single-ingredient finished products as they leave the establishment. Procedures, such as the application of antimicrobial solutions or of water that may temporarily contribute weight to the product, need not be declared. However, establishments are expected to maintain data clearly demonstrating that the finished products do not retain water.

12. Is it acceptable to export products with retained water without labeling bearing a percentage retained water statement?

Answer: Deviations from domestic labeling rules are permitted in accordance with 9 CFR 317.7 or 381.128. However, the labeling record at the Federal establishment and in the label submission must assure that the labeling deviation is in accordance with the specifications of the foreign purchaser and with the laws of the foreign country. Additionally, the shipping container must be labeled to show that the product is intended for export; i.e., “for export only to \_\_\_\_\_.” The documentation can be provided by the importer, the exporter, or an official with the foreign government of the country to which the product is destined. **(NOTE: Labels for export product that deviate from the domestic requirements cannot be generically approved and are to be submitted to the Labeling and Consumer Protection Staff for approval.)**

13. Can one document, i.e., letter, be applied to multiple products for export?

Answer: Yes, if the documentation is complete by indicating all exported products with labeling deviations and is only for the country to which the products are destined.

14. Does the retained water rule apply to ice-glazed poultry?

Answer: Yes. A retained water statement is required because the product is single ingredient regardless of whether the product is ice-glazed or not. The ice-glaze is not an ingredient; its purpose is to prevent shrinkage during freezing.

15. How are single-ingredient products with retained water (e.g., bearing contains X percent retained water statements) handled when they are sent in bulk to retail stores for packaging? What effect would in-store cut-up or grinding operations have on the labeling of single-ingredient products with retained water at the retail store?

Answer: The retained water statement that is applied to the cuts or ground products would be the same as the retained water statement that was applied to the bulk product. However, the retail store may choose to show through documentation that less or no water is retained in the cuts or ground product and to label the product accordingly.

16. What happens to a product when the retained water declaration exceeds the 20 percent label declaration?

Answer: The company has two options. One is to accurately relabel the product. The other option would be to allow the product to drain so that the retained water statement is truthful. This may involve re-packaging the product unless the product is ice pack poultry in drainable containers.

17. How is the retained water statement handled with chitterlings since the product is allowed to be packaged with up to a 20 percent purge?

Answer: Many years ago, before 1992, FSIS allowed, under normal conditions and good manufacturing practices, purge in containers of chitterlings not to exceed 20 percent of the marked weight of the product. The policy is long-held and is practiced industry wide. Consumers who purchase this product are aware of the policy and practice and have come to expect moisture content in chitterlings. As a result of this long-standing policy, no retained water statement is required when chitterlings are packaged with a purge. If chitterlings retain water during post evisceration processing and are not packaged with a purge, the product's labeling is required to bear a retained water statement.

18. What is FSIS position regarding the use of water in thawing process?

Answer: Frozen meat, meat byproducts, poultry, or poultry byproducts are often thawed using chilled water. Establishments have to assess whether the product is absorbing water during the thawing process. If the final product is raw, single-ingredient, and absorbed water during the thawing process, a retained water statement is necessary. However, if the final product is subsequently processed into a multi-ingredient item or cooked, the retained water is not a labeling or standards concern.