

Food Safety and Inspection Service (FSIS)

Compliance Guide on the Determination of Processing Aids

Purpose of the Compliance Guide

The intent of this guidance is to convey FSIS' approach to determining whether an ingredient may be considered a processing aid. Processing aids do not have to be declared in the ingredients statement on the label of the meat or poultry food product in which they are used.

Regulatory Requirements for Processing Aids

Ingredients that are present in a meat or poultry product in an insignificant amount and that have no functional or technical effects in the finished meat or poultry product are considered to be processing aids. Processing aids are not required to be listed in the ingredients statement for a meat or poultry product. Although the Federal meat and poultry inspection regulations do not define "processing aid," FSIS, in evaluating whether a substance is a processing aid, uses the Food and Drug Administration's (FDA) definition of this term, which is in 21 CFR 101.100(a)(3).

According to the FDA definition, processing aids are substances that have no technical or functional effect in a finished food but may be present in that food by having been used as ingredients of another food in which they had a technical effect. For example, sodium silicoaluminate will provide a technical effect as an anti-caking agent in a dry seasoning mix. However, once the seasoning mix is used in the formulation of a meat sausage, the sodium silicoaluminate will no longer provide a technical effect in the finished food (i.e., the sausage). Processing aids are defined as:

- (a) substances that are added during the processing of a food but are removed in some manner from the food before it is packaged in its finished form;
- (b) substances that are added to a food during processing, are converted into constituents normally present in the food, and do not significantly increase the amount of the constituents naturally found in the food; or
- (c) substances that are added to a food for their technical or functional effect in the processing but are present in the finished food at insignificant levels and do not have any technical or functional effect in that food.

Whether a substance meets these conditions is determined by FSIS on a case-by-case basis by considering the proposed use of the substance and the specific meat or poultry product to which it is added. **Self-determination by manufacturers that a substance is a processing aid is not acceptable.** Data must be submitted to FSIS' Labeling and

April 8, 2008

Program Delivery Division (LPDD) to show that the proposed use of the substance is consistent with FDA's definition of a processing aid. Manufacturers may contact LPDD at (202) 205-0623 for guidance concerning what information needs to be submitted to support their assertion that a particular use of a substance in a meat or poultry product is a processing aid.