

# Labeling Syrup in West Virginia

(portion of the package that is most likely to be seen by the consumer when on a store shelf)

- CFR-Code of Federal Regulations
- FPLA-Fair Packaging & Labeling Act
- PDP-Principal Display Panel

- 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.

- 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*

- 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*



- 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.

## Ingredients:

Maple Syrup



- 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 Interstate Commerce

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

Example: Direct sales of maple products at Maple Days

-Business Transaction (or  
West Virginia  
Farmers' Market  
Vendor Guide

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

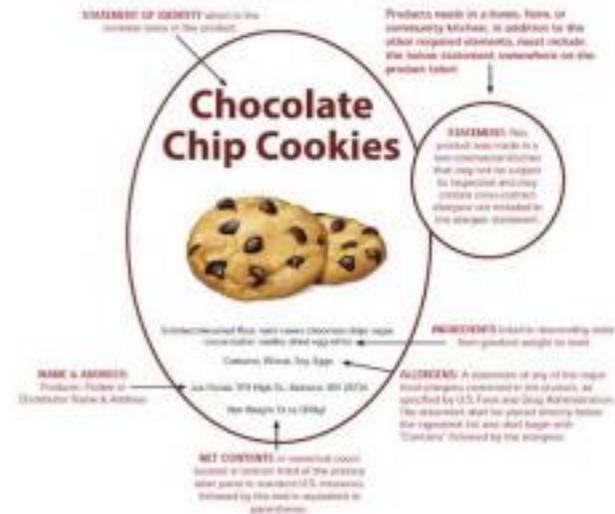
- Labeling requirements:
  - Different for potentially hazardous and non-potentially hazardous food products
- 2023 manual:  
<https://agriculture.wv.gov/wp-content/uploads/2023/02/Farmers-Market-Vendor-Guide.pdf>
- See page 5 for note about net weight statement specific to maple syrup; page 9 for tree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

## 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”

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



## 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

[https://agriculture.wv.gov/wp-content/uploads/2023/02/Farmers Market-Vendor-Guide.pdf](https://agriculture.wv.gov/wp-content/uploads/2023/02/Farmers-Market-Vendor-Guide.pdf)