

	Document Name:	LABELING STANDARDS FOR GORDON FOOD SERVICE PRIVATE BRAND FOOD & BEVERAGE PRODUCTS		
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	Created: Revised: Effective:	2/1/2010 11/7/2025 11/7/2025	Owner: NA Brands and Quality Assurance Teams	

PURPOSE: To define the labeling requirements for U.S. Gordon Food Service private brand food & beverage products

REFERENCES: 21 CFR 101 Food Labeling; USDA-FSIS Food Standards and Labeling Policy Book; A Guide To Federal Food Labeling Requirements For Meat And Poultry Products; FDA Food Allergen Labeling and Consumer Protection Act (FALCPA) of 2004 and the FASTER Act of 2021; Section 403 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 343); 7 CFR Part 60 and Part 65 Country of Origin Labeling

1.0 RESPONSIBILITIES:

Suppliers are responsible to follow the Gordon Food Service Brand packaging project process and provide data required in order to produce labeling that meets regulatory and industry standards. The requirements in this document **do not** supersede any federal, state or municipal regulations. It is Gordon Food Service's expectation that the supplier and/or manufacturer ensures that product and packaging components meet all applicable regulatory labeling requirements.

2.0 REQUIRED INFORMATION:

a) Statement of Identity: shall appear as required by Federal regulation or the common name, as applicable.

b) Ingredients: shall be listed by common or usual name in descending order of predominance by weight

c) The Declaration of the Net Quantity of Contents:

Liquids - The statement shall be in terms of fluid measure (fl. oz.)

Dry/Solids – The statement shall be in terms of weight (lbs. oz.)

GFS requires a three-part net content/net weight declaration. (Example: NET WT 51 OZ (3 LB 3 OZ) 1.45 kg) Compliance with this requirement will be verified through the packaging development process.

The FDA's regulations allow for the use of firmly established general consumer usage and trade custom of declaring the contents when it comes to food that is semisolid, viscous, or a mixture of solid and liquid in nature (ref. 21 CFR 101.7), as to whether the declaration should be expressed as weight (ounces) or volume (fluid ounces). The following standards have been set for these types of products, based on researched industry standards with the Association for Dressings and Sauces:

Product type	Net Weight (lbs. oz.) declaration	Net Contents (volume) (fl. oz.) declaration
Mayonnaise, Salad Dressings Pourable Dressings Steak Sauce Tarter Sauce Other Syrups		X
Chocolate syrups BBQ Sauce Cocktail Sauce Mustard	≤ ½ Gallon	> ½ Gallon
Portion condiments Canned Tomato Sauces	X	

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d) "Distributed by" Statement: The following statement shall be used:

**FOR DISTRIBUTION EXCLUSIVELY BY
GORDON FOOD SERVICE
WYOMING, MI 49509 / GFS.COM**

e) "Additional Information" Statement: Immediately following (or in close proximity to) the "Distributed by" statement, the following statement is to be displayed:

**FOR MORE INFO CALL CUSTOMER SERVICE
800-968-4164 OR VISIT GFS.COM THANK YOU.**

f) Nutritional Labeling: shall meet the requirements of 21 CFR 101.9. While this regulation exempts food sold to restaurants, Gordon Food Service private brand food labeling standards require the display of nutritional labeling. In addition, the serving size must be expressed in the same terms as the net contents statement (weight or volume)

g) Allergen Labeling: GFS private brand food & beverage supplier requirements include segregation of allergen and non-allergen ingredients in their production facilities, confirming production lines are thoroughly cleaned when changing from allergen-containing to non-allergen-containing products; and after cleaning conducting inspections to verify that it has been effective.

Allergen labeling shall be declared via a "Contains" statement immediately following or adjacent to the ingredient statement by using the common name of the allergen. The term 'major food allergen' means any of the following nine allergens required to be declared if present in the product:

- 1) Milk, egg, fish (e.g., bass, flounder, or cod), Crustacean shellfish (e.g., crab, lobster, or shrimp), tree nuts (e.g., almonds, pecans, or walnuts), wheat, peanuts, soy, and sesame.
- 2) A food ingredient that contains protein derived from a food specified in paragraph (1), except the following:
 - (A) Any highly refined oil derived from a food specified in paragraph (1) and any ingredient derived from such highly refined oil.
 - (B) A food ingredient that is exempt under paragraph (6) or (7) of section 403(w).

Allergens other than these major nine are not declared on Gordon Food Service private brand labeling

In the event that a particular product type and/or manufacturing line from our supplier will not lend itself to sufficient cleaning or segregation for allergens, under the direction of the supplier, we will add a **May Contain** statement on the label indicating that the product **May Contain** XX Major Food Allergen.

h) Country of Origin Labeling (COOL) requires the display of information regarding the source of certain foods and imported goods. Currently the food products (covered commodities) contained in the law include muscle cut and ground meats: lamb, goat, and chicken; wild and farm-raised fish and shellfish; fresh and frozen fruits and vegetables; peanuts, pecans, and macadamia nuts; and ginseng. It is the responsibility of the supplier to keep labeling current as necessary in light of any changes to the regulation to satisfy the COOL requirements found in 7 CFR Part 60 and Part 65.

i) USDA Establishment Seal: for products under the jurisdiction of the USDA produced in Federally-inspected facilities, labeling must contain the USDA inspection symbol and shall be displayed according to the size, placement and location requirements of the USDA. Suppliers with multiple facilities may print the USDA

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Establishment number in-line or on the label.

- j) Kosher seal:** Products that have met the requirements of a certifying Kosher organization may display the appropriate Kosher certification mark. It is the responsibility of the supplier to satisfy the manufacturing practices and documentation requirements necessary to allow the display of the mark. The supplier is also to provide Gordon Food Service with documentation supporting Kosher approval on our brand.
- k) Halal seal:** Products that have met the requirements of a Halal certifying organization may display the appropriate Halal certification mark. It is the responsibility of the supplier to satisfy the manufacturing practices and documentation requirements necessary to allow the display of the mark. The supplier is also to provide Gordon Food Service with a copy of the certification documentation for our records.
- k) Gluten Free:** Gluten Free shall only be indicated if the product will meet the definition of gluten-free as outlined in 21 CFR Part 101.91 "Food Labeling; Gluten-Free Labeling of Foods" (including any changes to the regulation).
- l) Bar codes:** Labeling shall display bar codes that meet the requirements of GS1 as specified in the NA Barcode Requirements

Description of Revision	Revisor
Added reference to sesame as a major allergen, added FASTER Act of 2021 to references	Lynnae Wurr
Updated ref. 21 CFR 101.105 to ref. 21 CFR 101.7 per latest amendment; Updated Distribution Statement language; Simplified Net Qty of Contents table; Updated COOL to remove beef, pork & veal, added imported goods; Updated Gluten Free section; Changed Gordon Food Service Bar Code Compliance Manual to NA Barcode Requirements; added section for Halal	Erin Dean & Danielle Portfleet