MSA DIRECTIVE	7221.1 Rev. 4	10/26/2026

LABEL APPROVAL AND PHIS GENERAL LABELING TASK

I. PURPOSE

This directive provides instructions to inspection program personnel (IPP) when submitting labels to the Label Review Staff (LRS) for approval and provides instructions for completing the MSA Z-1 Form. The directive also provides instructions for IPP when conducting the General Labeling task in the Public Health Information System (PHIS).

IPP are to review this directive and the new label approval process with their establishments and document the meeting in an MOI.

II. CANCELLATION

MSA Directive 7221.1 Label Approval and PHIS General Labeling Task Rev. 3.1 Dated 6/18/2026.

III. BACKGROUND

A. IPP are to be aware that establishments are responsible for ensuring that labels used for meat and poultry products are not false or misleading, and for ensuring that labels comply with the State meat and poultry products inspection regulations and policies.

B. IPP are to be aware that sketch labels, along with a completed MSA Z-1 Form, and all supporting documentation are to be submitted to LRS for evaluation prior to use.

IV. SKETCH LABEL SUBMISSION AND APPROVAL

A. An approved MSA Z-1 Form must be completed before meat and poultry products, labeled under MSA regulations, may enter commerce.

B. The establishment is to complete the Z-1 Form and provide all the necessary supporting documentation needed to complete the label packet. Along with the Z-1, the label packet will also include the label proof, pictures of ingredients in the product, and any necessary additional documentation.

C. The Inspector In Charge (IIC) should use the MSA 60 Form to review the label packet for completeness. Once the IIC has completed their review, they must sign and date the Z-1 (Box 15) and the MSA 60 Form. Include the signed MSA 60 Form in the packet.

D. The IIC is to email the completed packet to their designated Team Lead (TL) or Circuit Manager (CM) for review.

NOTE: Each circuit may determine who will be the primary contact for labels in their circuit. Please inform the LRS if there is a specific way your circuit would like labels sent back to you.

E. The TL or CM will review the label packet for completeness and sign date in box 16 on the Z-1 once their review is complete.

F. Once the Z-1 has both the IIC signature and the CM or TL signature, the completed label packet should be sent to the MSA Label email address **MSALabels@dshs.texas.gov**. The packet can be sent by IPP or circuit management.

NOTE: Label packets that are missing the MSA 60 Form or any required signatures will be returned to the circuit without review.

G. The LRS will review the label packet and notate any necessary revisions. The LRS will work with the IIC during the label review process should questions arise or if additional information is needed.

H. Once LRS has completed its review, the IIC (or your circuits designated TL or CM) will be provided with the sketch approved Z-1 Form. The IIC is to review the sketch approved Z-1 with the establishment and communicate any needed revisions.

I. The establishment will provide the IIC with a copy of the final label. The IIC will review the final label to make sure it matches the sketch approved Z-1. Once the label matches the sketch approved Z-1, IPP are to complete box 9 on the original sketch approved Z-1.

J. The IIC is to use the MSA Z-1b (See Attachment 2) to scan in the final label. The IIC is to stick or tape the final version of the label on this page and sign and date at the bottom of the page. This page should be scanned and uploaded into the establishment's folder on the Circuit SharePoint page.

- The scanned Z-1b should be titled with the label approval number and the product name.
  - Ex – 0601234012 Smoked Sausage

NOTE: Labels or bags that are bigger than the grid section on Z-1b can be scanned separately but the Z-1b should still be signed and dated. Both pages should be uploaded into the establishment's folder on the Circuit SharePoint.

K. IPP are required to retain the LRS approved Label Packet and a copy of the final label in the establishment files as a reference when conducting future General Labeling task in PHIS. These files can be uploaded into the Establishment's SharePoint folder.

NOTE: See Attachment 1 for a step-by-step breakdown of the Label Approval process.

V. LABEL UPDATES AND APPROVAL

A. If the establishment wants to update a label that has previously been approved by the LRS, the establishment is to inform inspection staff of the update they wish to make.

B. Updates may include: a logo change, bag color change, net weight change (adding a 2oz bag along with a previously approved 6oz bag), picture changes etc. If IPP are unsure if the change requires a Z-1, they are to email the LRS at the MSALabels@dshs.texas.gov email address.

NOTE: If this is an entirely new label or type of label (pressure sensitive to pre-printed bags) for a product with a previously approved label, it will need a new Z-1 and approval number. If the establishment wishes to replace the old label with this new label, please inform the LRS when the new label is sent in.

C. Inspection staff will compile all the necessary documents for approval and email them to MSALabels@dshs.texas.gov

- Label Approval Packet for previously approved label. If the Label packet is unavailable, please be sure to attach the label approval number
- Sketch of new label
- Any documents necessary for the changes / additions

VI. IPP VERIFICATION ACTIVITIES IN OFFICIAL ESTABLISHMENTS

A. IPP in meat and poultry establishments are to continue to perform the General Labeling task when scheduled in PHIS. When scheduled, IPP are to randomly select one or more labels for verification from products in production at the assigned establishment.

B. IPP are to verify that the establishment is maintaining records of the selected labels in accordance with 9 CFR 320.1(b)(10) for meat products and 9 CFR 381.175(b)(6) for poultry products. Labeling records are to be made available to MSA personnel within 24 hours of request. Each labeling record should include: a copy of the final label that is in use, the product formulation, the processing procedure for the product, and any supporting documentation needed to show that the label is consistent with the State meat and poultry regulations and policies on labeling as described in 9 CFR 412.1. Establishments should also provide the completed MSA Z-1 Form and are to indicate that approval was granted by LRS. Accordingly, the final label is to comply with any/all modifications and conditions of use put forth by LRS in the label approval (9 CFR 412.1(a)).

C. IPP are to verify regulatory compliance of the final label by reviewing it for the presence of all applicable required features listed in Table 1: Required Labeling Features.

Table 1: Required Labeling Features

Feature	Reference	Location	Applies to
Product Name	9 CFR 317.2(c)(1) or 381.117	Principal display panel	All products
Inspection Legend	9 CFR 317.2(c)(5) or 381.123	Principal display panel	All products
Handling Statement (e.g., "Keep Frozen")	9 CFR 317.2(k) or 381.125(a)	Principal display panel	Products requiring special handling to maintain wholesomeness
Net Weight Statement	9 CFR 317.2(h) or 381.121	Principal display panel in the bottom 30%	Product sold at retail, unless the net weight is applied at retail
Ingredients Statement*	9 CFR 317.2(f) or 381.118	Information panel or Principal display panel	Products with multiple ingredients
Address Line	9 CFR 317.2(g) or 381.112	Information panel or Principal display panel	All products

Nutrition Facts Panel	9 CFR 317.300 or 381.400	Information panel or Principal display panel	Products not exempted by 9 CFR 317.400 or 381.500
Safe Handling Instructions	9 CFR 317.2(l) or 381.125(b)	Any panel	Products with a not-ready-to-eat meat or poultry component

NOTE: All ingredients used in the product must be listed in the ingredients statement. Product is considered misbranded and adulterated if an allergen is not listed in the ingredients statement. IPP are to contact their supervisor for guidance if at any time they have reason to believe that product failing to declare one or more of the "big 9" allergens [wheat, crustacean shellfish (e.g., crab, lobster, shrimp), eggs, fish, peanuts, milk, tree nuts (e.g., almonds, pecans, walnuts), soybeans, sesame] or other ingredients of public health concern has entered commerce.

VII. DETERMINING AND DOCUMENTING NONCOMPLIANCE

A. IPP are to document the results of their verification, including any noncompliance in PHIS.

B. When a label is not in compliance with the regulatory requirements, IPP are to document the noncompliance in an NR in PHIS, citing the relevant reference from Table 1. In addition, IPP are to retain any product bearing that label and require establishments to update labels that are not in compliance with MSA labeling regulations. Before the product may enter commerce, the establishment must take corrective action by replacing the noncompliant label with a compliant label. IPP should contact their Circuit Manager if improperly labeled product has entered commerce.

NOTE: The replacement labels must be submitted to LRS for review if the establishment either does not have a label on file or the label does not match the label on file.

C. There may be times when an inspector is not performing the General Labeling task but observes a product label that is not in compliance with State meat and poultry regulations. For example, if during the course of duty, IPP find that an ingredient is not declared on the final label, the net weight is incorrect, or the order of predominance of the ingredients on the label is inaccurate, IPP are to initiate a directed General Labeling task, retain the affected product, and document the noncompliance in PHIS as described above.

NOTE: IPP are to contact their Circuit Manager (CM) for guidance if at any time they have reason to believe that misbranded product has entered commerce.

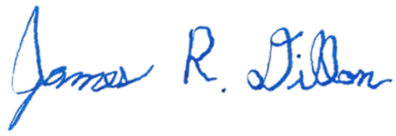
VIII. SUPERVISORY RESPONSIBILITIES

A. Supervisors are to ensure that IPP are familiar with reviewing, and know how to review labels and labeling records.

B. When "big 9" allergens or other ingredients of public health concern are not properly declared, a recall may be warranted. The CM is to alert the Central Office to potential distribution of products that may pose a public health concern.

IX. QUESTIONS

Refer immediate questions about this directive through supervisory channels or the MSAlabels@dshs.texas.gov inbox, and use ASK MSA for questions not requiring an immediate response.



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Department of State Health Services

Attachment 1

Label Approval Process

1. Establishment fills out the Z-1 Form and provides the necessary items for the label packet:
    a. Label Proof
    b. Pictures of the Ingredients imbedded in a Word or PDF document
        i. Note: All ingredients should be on one document, each ingredients does not need it's own document.
    c. Any other necessary documents
        i. Water activity, Claim Affidavit, Go Texan Certification.
2. Establishment provides the label packet to the IIC.
3. IIC reviews the label packet for completeness and fills out and signs the MSA 60 Form. IIC also signs the Z-1 Form.
4. IIC sends the label packet to the Circuit Manager or Team Lead. CM or TL will review the label packet and sign the Z-1 Form.
5. Inspection Staff (IIC, TL, or CM) will send the label packet to the Label Review Staff (LRS) at the MSA Labels email.
    a. MSALabels@dshs.texas.gov
6. LRS will review the label and make the necessary corrections.
7. LRS will send the label packet back to inspection staff.
    a. With a CC to CMs and TLs
8. IIC will give the establishment the label packet and instruct them on the edits.
9. IIC will review and verify the corrections on the final label.
10. IIC will complete box 9 on the Z-1.
    a. Check the box
    b. Initial and Date
11. IIC will place the final label on the Z-1b, sign and date, and scan the document. The document will then be uploaded into the establishment folder on the Circuit SharePoint.
    a. The scanned Z-1b should be titled with the label approval number and the product name.
        Ex – 0601234012 Smoked Sausage

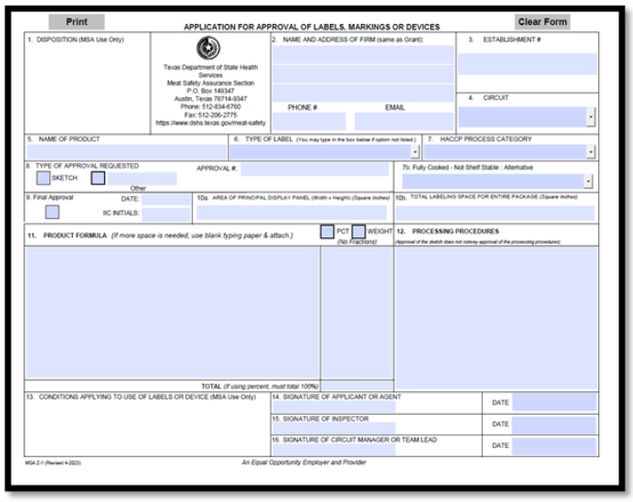
ANY LABEL PACKET MISSING SIGNATURES ON THE Z-1 OR THE MSA 60 WILL BE RETURNED TO SENDER.

ANY LABEL PACKETS SENT IN ON OLD VERSION OF THE Z-1 OR MSA 60 WILL BE RETURNED TO SENDER.

Label Approval Documents

All Documents can be downloaded from the MSA Forms Folder on SharePoint

MSA Z-1



Print

APPLICATION FOR APPROVAL OF LABELS, MARKINGS OR DEVICES

Clear Form

1. DISPOSITION (MSA Use Only)

Texas Department of State Health Services
Meat Safety Assurance Section
P.O. Box 149347
Austin, Texas 78714-9347
Phone: 512-834-6760
Fax: 512-206-2775
https://www.dshs.texas.gov/meat-safety

2. NAME AND ADDRESS OF FIRM (same as Grant):

PHONE #

EMAIL

3. ESTABLISHMENT #

4. CIRCUIT

5. NAME OF PRODUCT

6. TYPE OF LABEL (You may type in the box below if option not listed.)

7. HACCP PROCESS CATEGORY

8. TYPE OF APPROVAL REQUESTED
SKETCH
Other

APPROVAL #:

7b. Fully Cooked - Not Shelf Stable : Alternative

9. Final Approval
DATE:
IIC INITIALS:

10a. AREA OF PRINCIPAL DISPLAY PANEL (Width x Height) (Square Inches)

10b. TOTAL LABELING SPACE FOR ENTIRE PACKAGE (Square Inches)

11. PRODUCT FORMULA (If more space is needed, use blank typing paper & attach.)

PCT
WEIGHT
(No Fractions)

12. PROCESSING PROCEDURES
(Approval of the sketch does not convey approval of the processing procedures)

TOTAL (If using percent, must total 100%)

13. CONDITIONS APPLYING TO USE OF LABELS OR DEVICE (MSA Use Only)

14. SIGNATURE OF APPLICANT OR AGENT — DATE

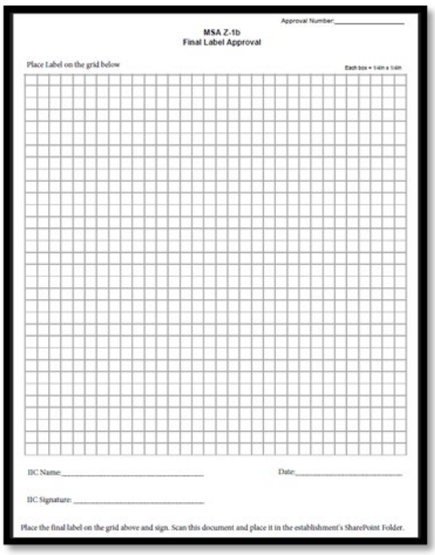
15. SIGNATURE OF INSPECTOR — DATE

16. SIGNATURE OF CIRCUIT MANAGER OR TEAM LEAD — DATE

MSA Z-1 (Revised 4-2023)

An Equal Opportunity Employer and Provider

MSA Z-1b



Approval Number:_____

MSA Z-1b
Final Label Approval

Place Label on the grid below

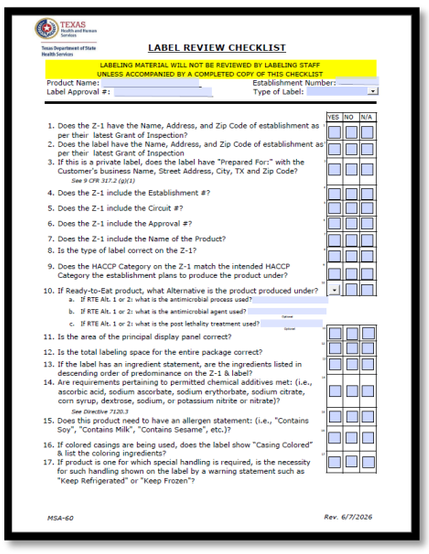
Each box = 1/4in x 1/4in

IIC Name:_____ Date:_____

IIC Signature:_____

Place the final label on the grid above and sign. Scan this document and place it in the establishment's SharePoint Folder.

MSA 60



TEXAS
Department of State Health Services

Texas Department of State Health Services

LABEL REVIEW CHECKLIST

LABELING MATERIAL WILL NOT BE REVIEWED BY LABELING STAFF UNLESS ACCOMPANIED BY A COMPLETED COPY OF THIS CHECKLIST

Product Name: _____ Establishment Number: _____

Label Approval #: _____ Type of Label: _____

	YES	NO	N/A
1. Does the Z-1 have the Name, Address, and Zip Code of establishment as per their latest Grant of Inspection?			
2. Does the label have the Name, Address, and Zip Code of establishment as per their latest Grant of Inspection			
3. If this is a private label, does the label have "Prepared For:" with the Customer's business Name, Street Address, City, TX and Zip Code? *See 9 CFR 317.2 (g)(1)*			
4. Does the Z-1 include the Establishment #?			
5. Does the Z-1 include the Circuit #?			
6. Does the Z-1 include the Approval #?			
7. Does the Z-1 include the Name of the Product?			
8. Is the type of label correct on the Z-1?			
9. Does the HACCP Category on the Z-1 match the intended HACCP Category the establishment plans to produce the product under?			
10. If Ready-to-Eat product, what Alternative is the product produced under?			
a. If RTE Alt. 1 or 2: what is the antimicrobial process used?			
b. If RTE Alt. 1 or 2: what is the antimicrobial agent used?			
c. If RTE Alt. 1 or 2: what is the post lethality treatment used?			
11. Is the area of the principal display panel correct?			
12. Is the total labeling space for the entire package correct?			
13. If the label has an ingredient statement, are the ingredients listed in descending order of predominance on the Z-1 & label?			
14. Are requirements pertaining to permitted chemical additives met: (i.e., ascorbic acid, sodium ascorbate, sodium erythorbate, sodium citrate, corn syrup, dextrose, sodium, or potassium nitrite or nitrate)? *See Directive 7120.3*			
15. Does this product need to have an allergen statement: (i.e., "Contains Soy", "Contains Milk", "Contains Sesame", etc.)?			
16. If colored casings are being used, does the label show "Casing Colored" & list the coloring ingredients?			
17. If product is one for which special handling is required, is the necessity for such handling shown on the label by a warning statement such as "Keep Refrigerated" or "Keep Frozen"?			

MSA-60

Rev. 6/7/2026