



ENVIRONMENTAL HEALTH INFORMATIONAL BULLETIN

Subject: Labeling and Advertising of Ham, and Ham and Water Products

During routine inspections of Orange County retail food establishments, Environmental Health staff have observed several instances in which ham and water products were labeled or advertised as ham. This labeling/advertising practice was commonly observed at meat departments and delicatessens where "ham" is sliced to order. Most of these incidents involved labeling placards, denoting "ham", attached to wrapped or partially unwrapped packages of ham and water products. The labeling or advertising of ham and water product as ham is misleading to the consumer and a violation of the provisions of the California Health and Safety Code.

Specific standards of identity have been established in Federal law for ham, and ham and water products. These standards of identity set specific minimum "Protein Fat Free" percentage criteria for ham, and ham and water products. The standard of identity for baked ham requires a minimum Protein Fat Free percentage of at least 20.5%. Ham and water products, on the other hand, have a higher water to meat ratio and, consequently, a lower Protein Fat Free percentage. The amount of water added to a ham and water product will vary significantly, as will the cost of these products. Accordingly, the standard of identity for ham and water products requires that the percentage of weight, which is added ingredients, be included in the product's nomenclature.

The California Health and Safety Code considers a product to be misbranded or falsely advertised if the labeling or advertisement is "false or misleading in any particular". To advertise or label ham and water product as ham would be misleading, and thereby, false.

You are encouraged to evaluate the labeling and advertisement of ham, and ham and water products at your establishment, and to make any changes necessary to bring them in compliance with the law. You can insure that the labeling or advertisement of these products is accurate if it is consistent with the original label of the product. These were approved by the United States Department of Agriculture. All other proposed labels or advertisements should be submitted to Environmental Health for review.

If you have any questions regarding this issue, or questions regarding the labeling and advertisements of food products, please contact Environmental Health at (714) 433-6000.

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