Kraft Foods

Sheryl A. Marcouiller
Senior Food Law Counsel

July 25, 2001

Loretta A. Carey
Food Standards Branch (HFS-158)
Division of Programs and Enforcement Policy
Office of Food Labeling
Center for Food Safety and Applied Nutrition (HFS-820)
Food and Drug Administration
200 C Street, S.W.
Washington, D.C. 20204

Re: Docket No. 01P-0150
Temporary Permit for Market Testing
Salad Dressing Deviating from Standard of Industry
Permit 66 FR 18957, April 12, 2001

Dear Ms. Carey:

In your letter dated April 12, 2001, you directed us to submit finished labels for our Miracle Whip Brand Salad Dressing to be marketed under our temporary marketing permit, Docket No. 01P-0150. Final artwork for these labels is attached for your review. The chart below provides a description of each of the labels. One additional item (18 oz. Plastic Squeeze) has been added since our original submission of October 4, 2000.

Attachment Number	Description	UPC
RETAIL DIVISION		
1A	8 oz Glass Jar- FRONT	64501
1B	8 oz Glass Jar – BACK	64501
2A	10 oz. Plastic Squeeze- FRONT	64532
2B	10 oz. Plastic Squeeze- BACK	64532
3A	16 oz Glass Jar - FRONT	64504
3B	16 oz Glass Jar – BACK	64504
4A*	18 oz. Plastic Squeeze - FRONT	64509
4B*	18 oz. Plastic Squeeze - BACK	64509
5	32 oz Glass Jar	64511
6A	40 oz. Plastic Jar – FRONT	64545
6B	40 oz. Plastic Jar– BACK	64545
7A	48 oz. Plastic Jar- FRONT	64514
7B	48 oz. Plastic Jar- BACK	64514
8A	60 oz. Glass and Plastic Jar-FRONT	64515
8B	60 oz. Glass and Plastic Jar - BACK	64515

* New Item

01P-0150 SUP 1

Kraft Foods, Inc. Three Lakes Drive • Northfield, IL 60093-2753 • Phone 847.646.4206 • Fax 847.646.4431 or 4432

Attachment Number	Description	UPC
FOOD SERVICE		
9A	7/16 oz. Portion Control - FRONT	66371
9B	7/16 oz. Portion Control - BACK	66371
10	30lbs. Carton	64703
11	30 lbs. Pail	64705
12A	1 Gallon Plastic Jar- FRONT	64700
12B	1 Gallon Plastic Jar - BACK	64700
KRAFT FOODS INGREDIENT DIVISION		
13	32 lbs Carton	64740
14	50 lbs. Plastic Bag	72725
15	430 lbs. Drum	70551

The attached labels reflect a few minor changes from the labels submitted with our temporary market permit request of October 4, 2000.

	Submitted with 10/4 Permit Request	**Final Attached Artwork (Differences are underlined)**
Calories	Calories 60 Calories from Fat 45	Calories 60 Calories from Fat 45
Nutrition Content	Total Fat 5g (8%) Sat. Fat 0.5 g (3%) Cholesterol <5mg (1%) Sodium 340 mg (14%) Total Carb 4g (1%) Fiber 0g (0%) Sugars 3g Protein 0g Vitamin A 0% Vitamin C 0% Calcium 0% Iron 0% Vitamin K 6%	Total Fat 6g (9%) Sat. Fat 1g (5%) Cholesterol <5mg (1%) Sodium 100 mg (4%) Total Carb 2g (1%) Fiber 0g (0%) Sugars <1g Protein 0g Vitamin A 0% Vitamin C 0% Calcium 0% Iron 0% Vitamin K 15%

	Submitted with 10/4 Permit Request	**Final Attached Artwork**
Ingredient Line	Water, Soybean Oil, Vinegar, High fructose Corn Syrup, Modified Food Starch, Corn Syrup, Sugar, Salt, Egg Yolks, Eggs, Mustard Flour, Potassium Sorbate as a Preservative, Spice, Xanthan Gum, Paprika, Natural Flavor.	Soybean Oil, Water, Vinegar, High Fructose Corn Syrup, Eggs, Sugar, Modified Food Starch, Starch, Salt, Mustard Flour, Potassium Sorbate as a Preservative, Spice, Paprika, Natural Flavor

We are notifying you that our 15 month period began July 11, 2001.

Incidentally, we were surprised by the comment in the first paragraph of your April 12, 2001 letter that stated:

> ***"Furthermore, the petition to amend the food standard for salad dressing to which you refer in your letter would not permit the marketing of the proposed test product, even if such petition were granted"***

To the best of our knowledge, the formula upon which these labels are based is consistent with the petition submitted by the Association of Dressings and Sauces (ADS) dated January 13, 1998. In particular ADS requested the following standard for Salad Dressing:

> ***§169.150 Salad Dressing***
>
> ***(a)*** **Description.** ***Salad Dressing is a semi-solid oil-in-water emulsion that is prepared with vegetable oil, acidifying agent(s), and safe and suitable thickeners and emulsifiers including starchy paste. I contains at least 30% oil. Any additional ingredients that are safe and suitable may be used in the product.***
>
> ***(b)*** **Labeling.** ***The name of the food is "Salad Dressing". Each of the ingredients used in the food shall be declared on the label as required by the applicable provisions of parts 101 and 130 of this chapter.***
>
> ***(c)*** **Exceptions.** ***Salad Dressings made in compliance with §130.10 of this chapter are not subject to the mandatory ingredient requirements of subsection (a), and will be deemed in compliance with §130.10(b) without regard to Vitamin K content.***

Therefore, the egg yolk and preservative changes under this TMP are consistent with the proposed ADS standard.

Please do not hesitate to contact me at 847-646-4206, if you need additional information. Thank you for your consideration.

Very truly yours,

Sheryl Marcouiller

Kraft Foods North America, Inc.
Sheryl Marcouiller
Senior Food Law Counsel

1A

1A

8 oz. Glass Jar - FRONT
UPC 64501

NOVEMBER 15, 1996
8 OZ. MIRACLE WHIP
FRONT LABEL (GLASS)
G620-04501-0-09

CODE NO. 10 5660 1/10/95
DWG. NO. 77047 12/15/94

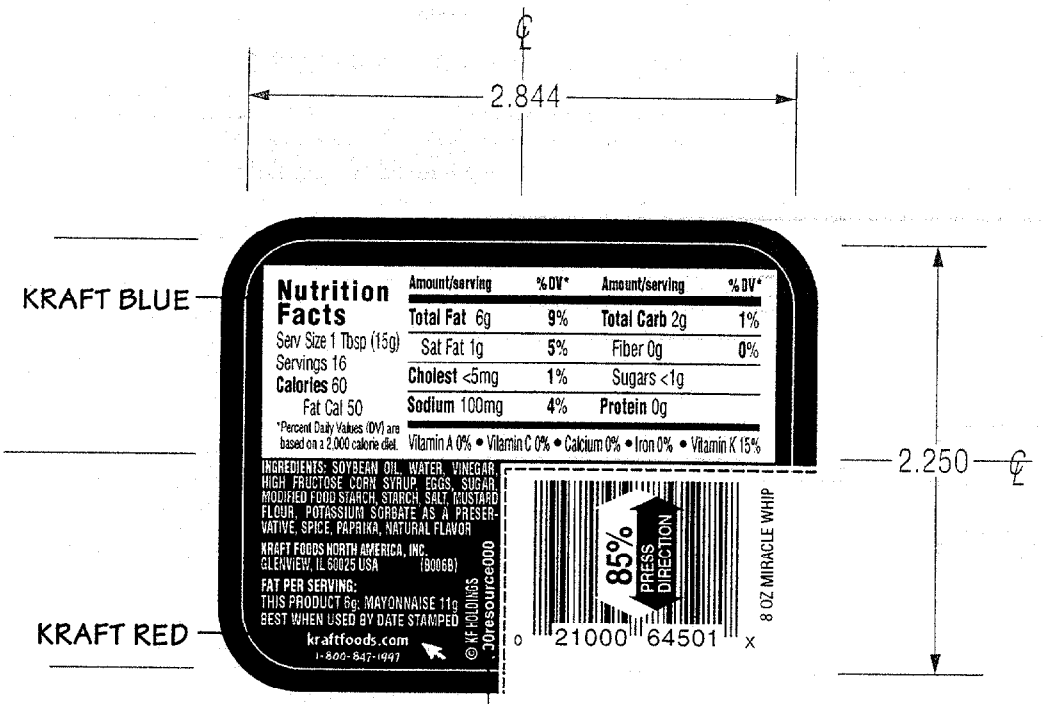
MANDATORY COLORS

KRAFT BLUE | KRAFT RED | PROCESS CYAN

FILE NAME: G620-04501-0-09
ADS:

1B

8 oz. Glass Jar - BACK
UPC 64501



RESOURCE NO.
FOR POSITION ONLY

JULY 23, 2001
8 OZ. MIRACLE WHIP-HFCS
BACK LABEL (GLASS)
84382.ai
DP #5614

CODE NO. 10 5660 1/10/95
DWG. NO. 77047 12/15/94
LCC NO. 217932 3/19/01

MANDATORY COLORS

KRAFT BLUE KRAFT RED

10 oz. Plastic Squeeze-FRONT
UPC 64532

2A

DECEMBER 14, 2000
10 OZ. SQUEEZE BOTTLE
MW
FRONT (PLASTIC)
82855.ai

DWG. NO. LAB/G1482 8/13/00

THE ARTWORK IN THIS FOLDER
IS THE PROPERTY
OF KRAFT PACKAGING
PLEASE DO NOT ALTER IN ANY WAY
YOU ARE RESPONSIBLE FOR ITS RETURN.

Art Directors' Service (ADS) has made every effort to supply an accurate file from the material received. It is the responsibility of Kraft Foods to examine and obtain the necessary approvals prior to releasing this file. ADS will not be liable for work performed after the release of this file.

DATE 12/11/00 TIME: 11:05a CLIENT # 9550-4

R2

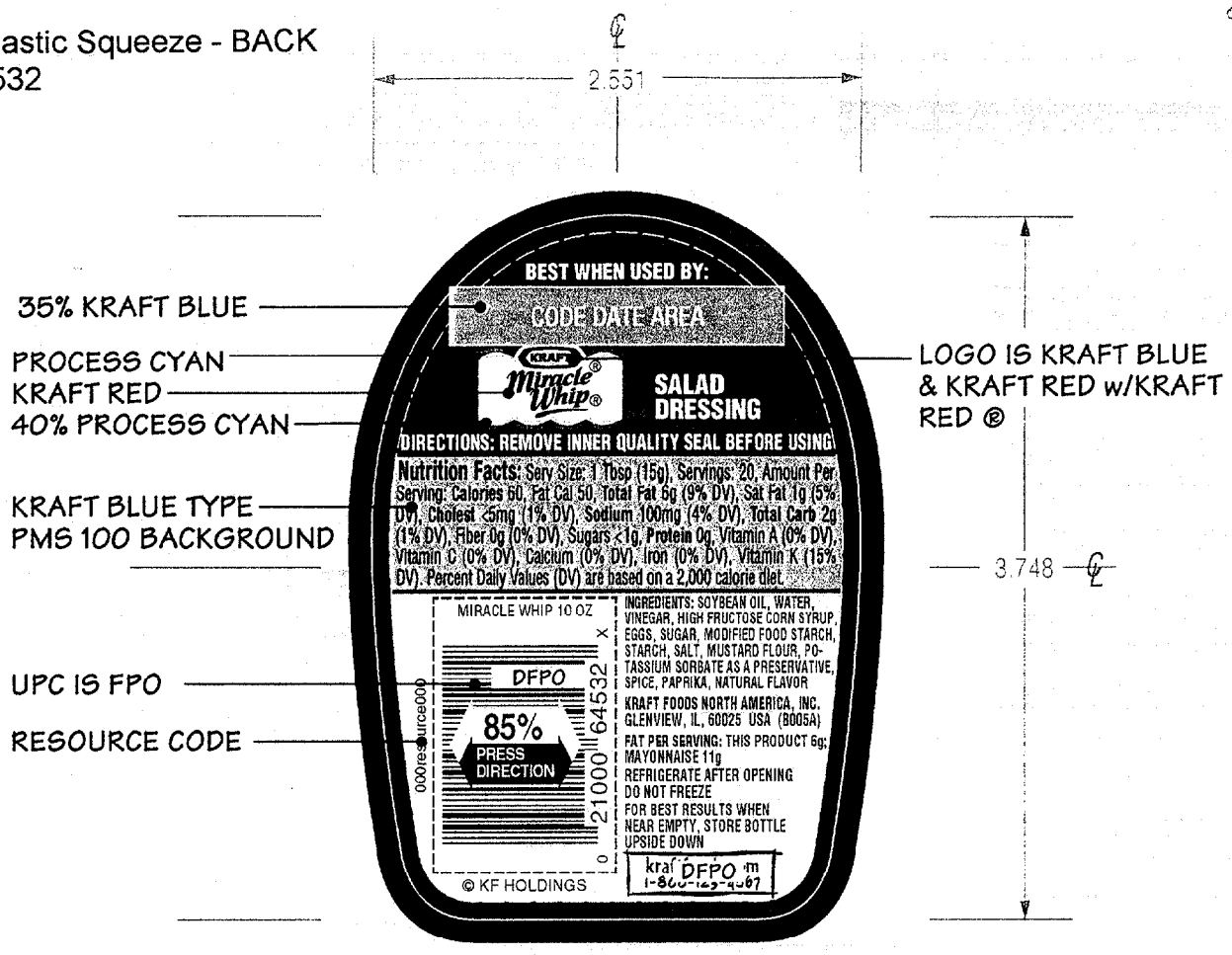
MANDATORY COLORS

KRAFT BLUE | KRAFT RED | PROCESS CYAN
PROCESS YELLOW | PMS 1375

2B

2B

10 oz. Plastic Squeeze - BACK
UPC 64532



JULY 23, 2001
PRESSURE SENSITIVE
10 OZ. SQUEEZE SPOONABLES BOTTLE
MW
BACK (PLASTIC)
DP#5614

DWG. NO. LAB/G1482 8/13/00
REF# KRONES DWG. 8-F00-L2-1204

MANUFACTURED COLORS
PANTONE AND KRAFT INKS
PMS 100

MANDATORY COLORS

KRAFT RED	KRAFT BLUE	PROCESS YELLOW
PROCESS CYAN		

3A

16 oz. Glass Jar - FRONT
UPC 64504

NOVEMBER 15, 1996
16 OZ. FRONT LABEL
FRONT LABEL (GLASS)
G620-04504-0-08

CODE NO. 10 5669 9/27/95
DWG. NO. 101051 9/5/95

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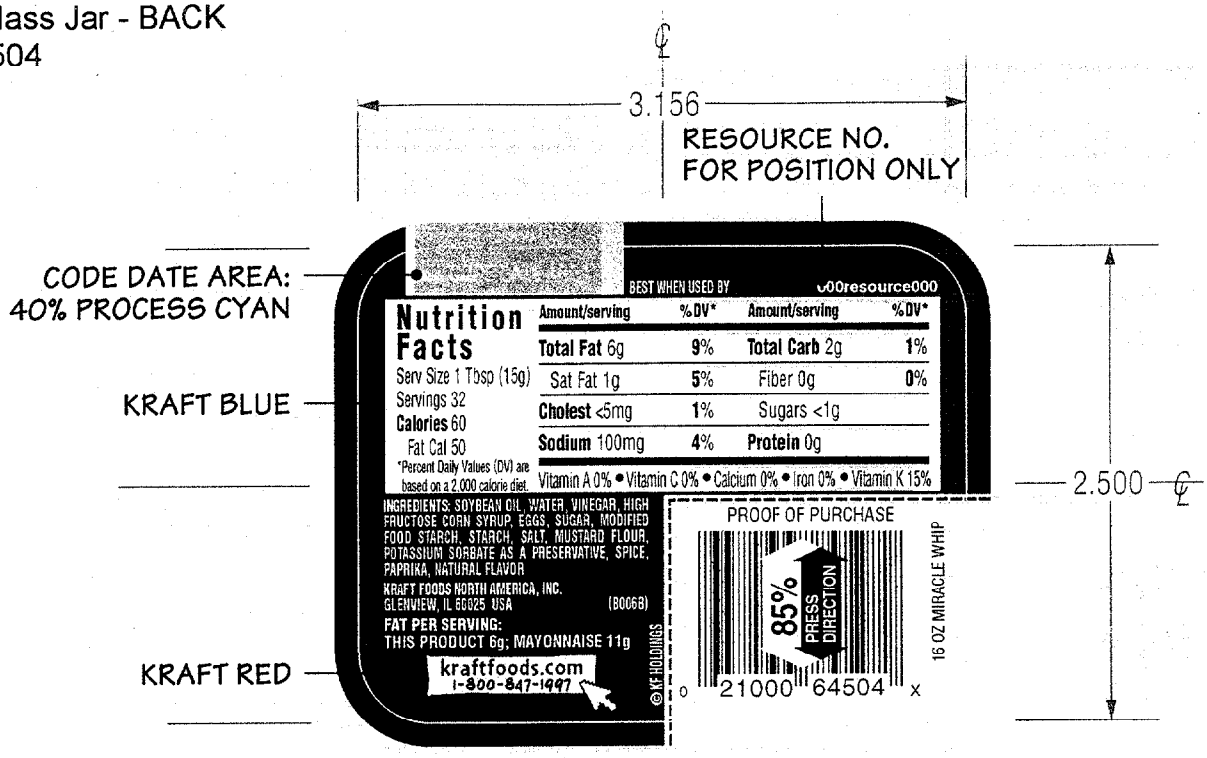
MANDATORY COLORS

KRAFT RED	KRAFT BLUE	PROCESS CYAN

FILE NAME: G620-04504-0-08
ADS:

3B

16 oz. Glass Jar - BACK
UPC 64504



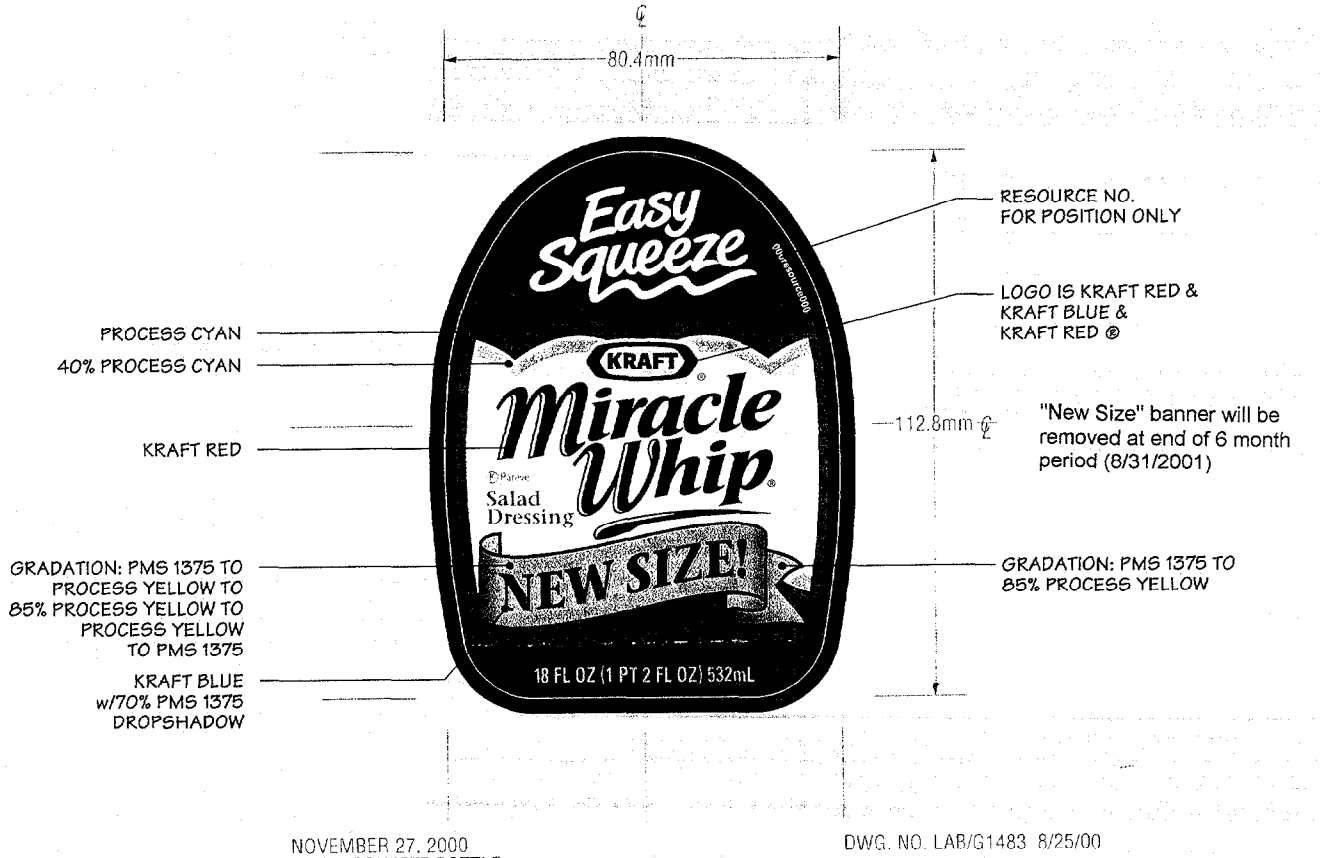
JULY 23, 2001
16 OZ. MIRACLE WHIP-HFCS
BACK LABEL (GLASS)
84383.ai
DP #5614

CODE NO. 10 5670 9/10/97
DWG. NO. LAB/G222 9/10/97
LCC NO. 217932 3/19/01

MANDATORY COLORS

KRAFT BLUE | PROCESS CYAN | KRAFT RED

18 oz. Plastic Squeeze - FRONT
UPC 64509



DWG. NO. LAB/G1483 8/25/00

NOVEMBER 27, 2000
18 OZ. SQUEEZE BOTTLE
MW
FRONT (PLASTIC)
82857.ai

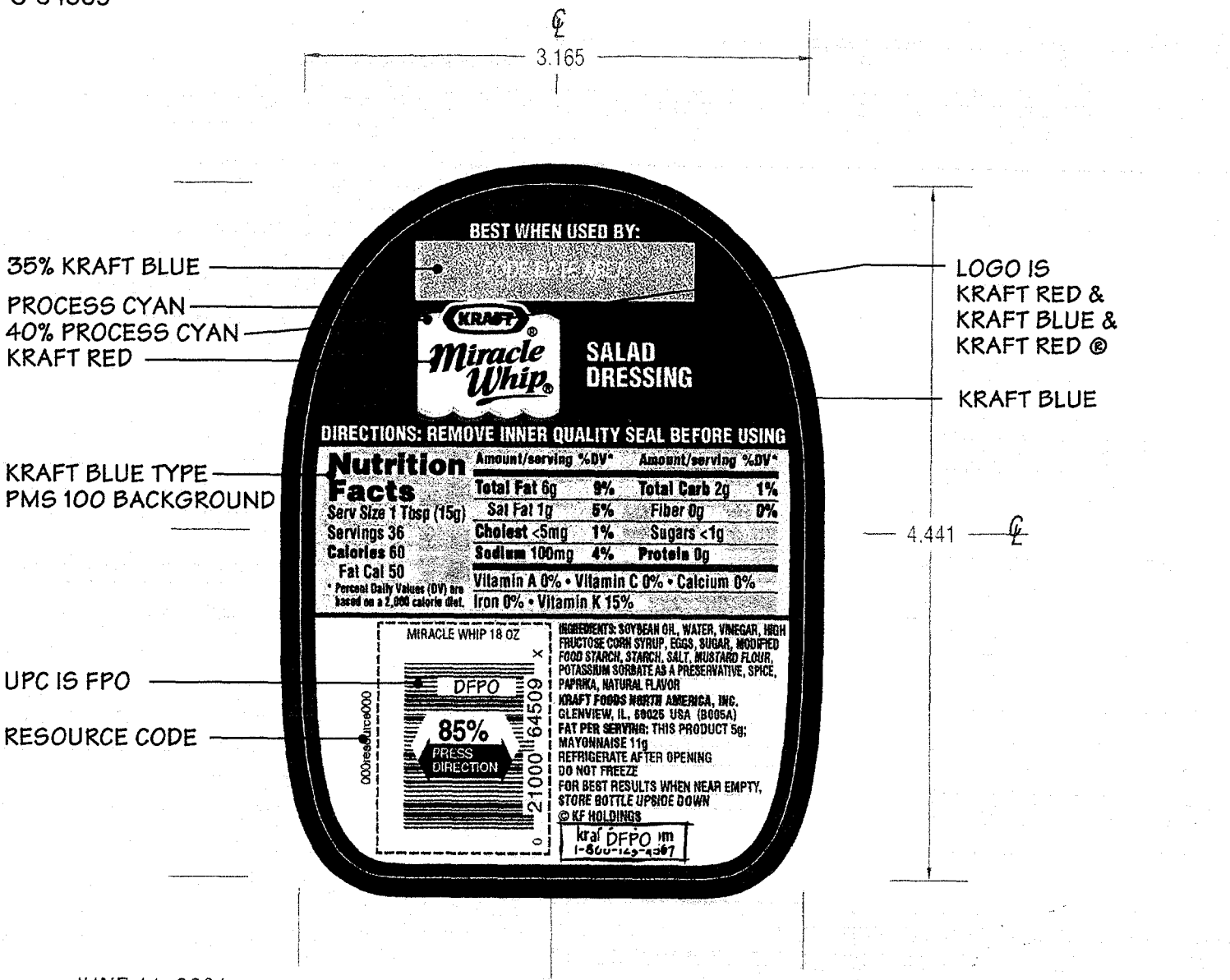
DATE 11/21/00 TIME: 3:35p CLIENT # 9550-4 **R1**

MANDATORY COLORS

KRAFT BLUE	KRAFT RED	PROCESS CYAN
PROCESS YELLOW	PMS 1375	

18 oz. Plastic Squeeze - BACK
UPC 64509

4B



JUNE 11, 2001
PRESSURE SENSITIVE
18 OZ. SQUEEZE SPOONABLES BOTTLE
MW
BACK (PLASTIC)
DP#4673

DWG. NO. LAB/G1483 8/1/00
REF# KRONES DWG. 8-F00-L2-1203

MANUFACTURED COLORS

PANTONE AND KRAFT INKS

PMS 100

MANDATORY COLORS

KRAFT RED | KRAFT BLUE | PROCESS YELLOW

PROCESS CYAN

5

32 oz. Glass Jar
UPC 64511

5

JULY 23, 2001
32 OZ. MW REGULAR
(GLASS)
SANDWICH IDEAS
MASTER
83453.ai
DP #5614

MANDATORY COLORS

KRAFT RED | KRAFT BLUE | PROCESS CYAN
PROCESS MAGENTA | PROCESS YELLOW

MANUFACTURED COLORS

PANTONE AND KRAFT INKS

PMS 100
PMS 116
PMS 124
PMS 128
PMS 289
PMS 600
PMS 2365
PMS 2563
PMS 2583

TOY094

TOY094 CFO162

CODE NO. 10 5708 7/14/99
DWG. NO. LAB/G1243 7/14/99
LCC NO. 214305 11/17/00

6A

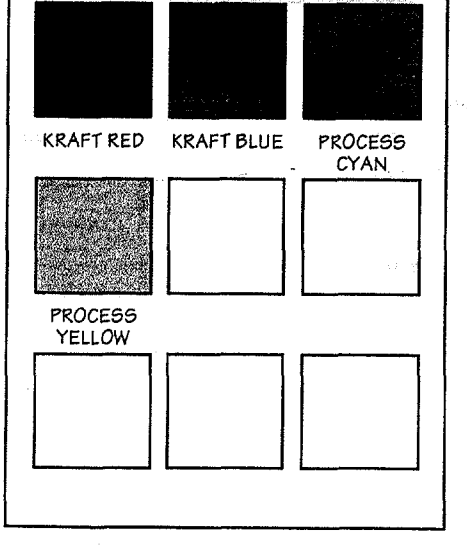
6A

40 oz. Plastic Jar - FRONT
UPC 64545

MAY 1, 1998
40 OZ. MIRACLE WHIP
FRONT LABEL
G620-04545-0-01

CODE NO. 10 5727 1/10/95
DWG. NO. 107007 12/15/94

MANDATORY COLORS



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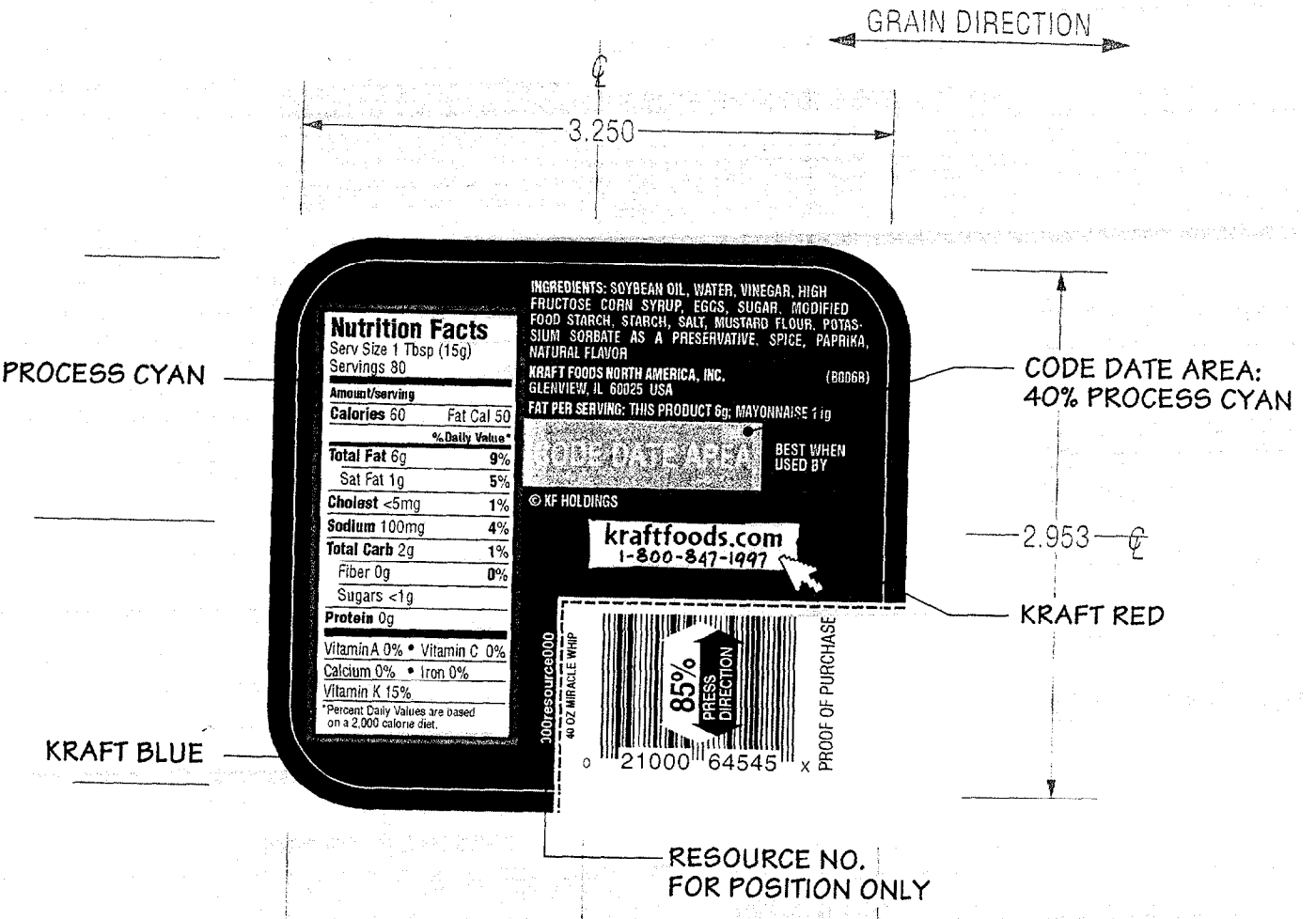
DATE 4/29/98 TIME: 8:24a CLIENT # 5565

6B

6B

40 oz. Plastic Jar - BACK
UPC 64545



JULY 23, 2001
40 OZ. MIRACLE WHIP-HFCS
BACK PANEL (PLASTIC)
84384.ai
DP #5614

CODE NO. 10 5921 8/17/98
DWG. NO. LAB/G852 8/17/98
LCC NO. 217932 3/19/01

MANDATORY COLORS

KRAFT BLUE | KRAFT RED | PROCESS CYAN

7A

7A

48 oz. Plastic Jar - FRONT
UPC 64514

OCTOBER 12, 1998
48 OZ MIRACLE WHIP
FRONT LABEL
71893 .ai

CODE NO. 10 5920 8/24/98
DWG. NO. LAB/G851 8/17/98

MANDATORY COLORS

KRAFT RED	KRAFT BLUE	PROCESS CYAN

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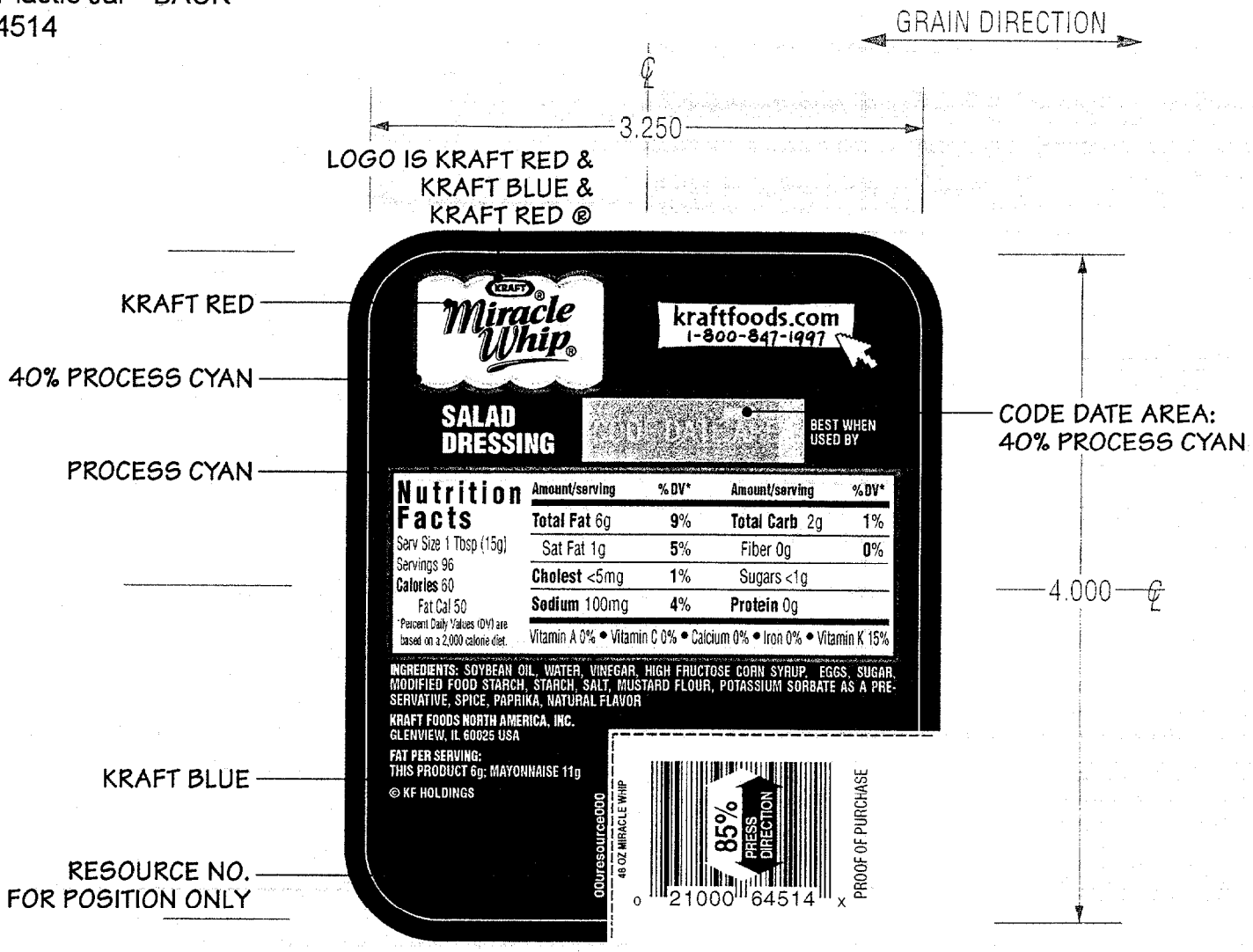
DATE 10/12/98 TIME: 4:25p CLIENT # 5904

7B

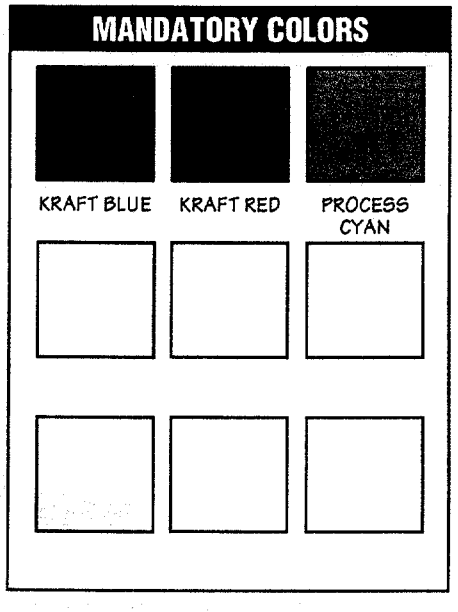
48 oz. Plastic Jar - BACK
UPC 64514



JULY 23, 2001
48 OZ. MIRACLE WHIP-HFCS
BACK LABEL (PLASTIC)
84385.ai
DP #5614

CODE NO. 10 5920 8/24/98
DWG. NO. LAB/G851 8/17/98
LCC NO. 217932 3/19/01

MANDATORY COLORS



8A

8A

60 oz. Glass and Plastic Jar FRONT
UPC 64515

NOVEMBER 15, 1996
60 OZ. MIRACLE WHIP
FRONT LABEL (GLASS & PLASTIC)
G620-04515-0-04

CODE NO. 10 5711 2/21/95
DWG. NO. 77052 12/15/94

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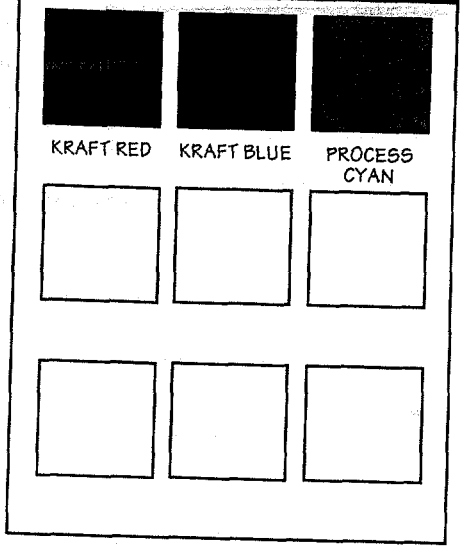
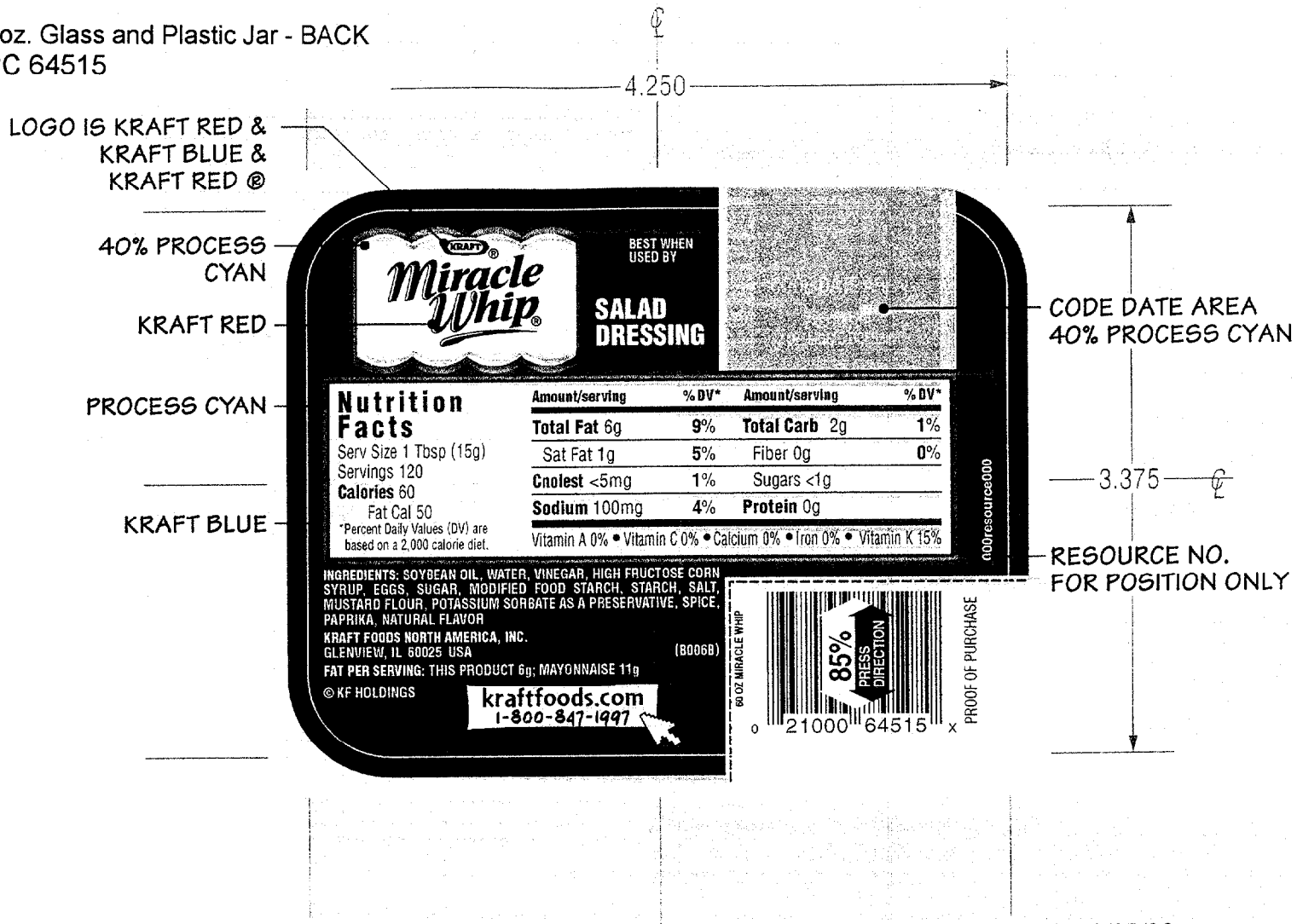
MANDATORY COLORS



FILE NAME: G620-04515-0-04
ADS:

8B

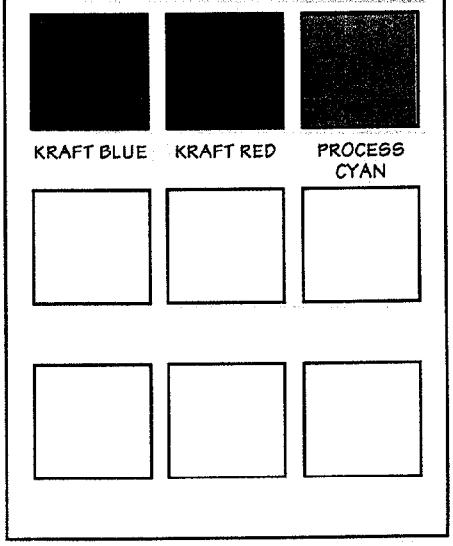
60 oz. Glass and Plastic Jar - BACK
UPC 64515



JULY 23, 2001
60 OZ. MIRACLE WHIP-HFCS
BACK LABEL (GLASS & PLASTIC)
84386.ai
DP #5614

CODE NO. 10 5711 6/25/96
DWG. NO. 77052 6/17/96
LCC NO. 217932 3/19/01

MANDATORY COLORS



9A

7/16 oz. Portion Control - FRONT
UPC 66371

DIRECTION OF FEED

JANUARY 18, 2001
7/16 OZ. MIRACLE WHIP
P.C. POUCH (FRONT)
FS-G02-66371-0-5.ai

CODE NO. 45 6316 7/27/00
DWG. NO. 112436 6/25/97

Foodservice Package Approval

Business Manager _____

Marketing Services _____

Legal FDA _____

TM _____

Regulatory Compliance _____

Signature Date Comments

MANDATORY COLORS

KRAFT BLUE | KRAFT RED | PROCESS CYAN

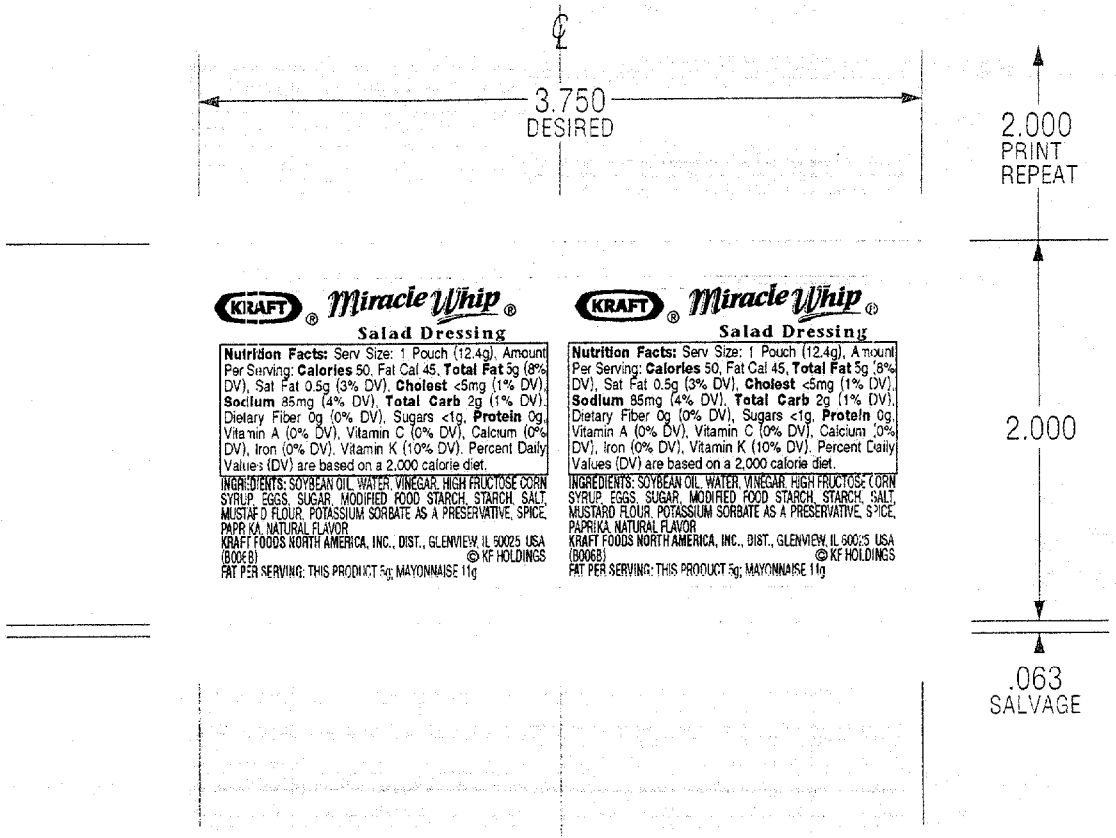
DATE 01/12/01 TIME: 12:55p CLIENT # 10130	R1	Artist 1 / Studio Manager
FILE NAME: FS-G02-66371-0-5.ai JOB # 127828		Proof #1 / Proof #2 / Account Mng./Exec.
ADS: KW		

9B

9B

7/16 oz. Portion Control - BACK
UPC 66371

DIRECTION OF FEED



KRAFT® Miracle Whip®
Salad Dressing

Nutrition Facts: Serv Size: 1 Pouch (12.4g), Amount Per Serving: **Calories** 50, Fat Cal 45, **Total Fat** 5g (8% DV), Sat Fat 0.5g (3% DV), **Cholest** <5mg (1% DV), **Sodium** 85mg (4% DV), **Total Carb** 2g (1% DV), Dietary Fiber 0g (0% DV), Sugars <1g, **Protein** 0g, Vitamin A (0% DV), Vitamin C (0% DV), Calcium (0% DV), Iron (0% DV), Vitamin K (10% DV). Percent Daily Values (DV) are based on a 2,000 calorie diet.

INGREDIENTS: SOYBEAN OIL, WATER, VINEGAR, HIGH FRUCTOSE CORN SYRUP, EGGS, SUGAR, MODIFIED FOOD STARCH, STARCH, SALT, MUSTARD FLOUR, POTASSIUM SORBATE AS A PRESERVATIVE, SPICE, PAPRIKA, NATURAL FLAVOR

KRAFT FOODS NORTH AMERICA, INC., DIST., GLENVIEW, IL 60025 USA
(B006B) © KF HOLDINGS
FAT PER SERVING: THIS PRODUCT 5g; MAYONNAISE 11g

KRAFT® Miracle Whip®
Salad Dressing

Nutrition Facts: Serv Size: 1 Pouch (12.4g), Amount Per Serving: **Calories** 50, Fat Cal 45, **Total Fat** 5g (8% DV), Sat Fat 0.5g (3% DV), **Cholest** <5mg (1% DV), **Sodium** 85mg (4% DV), **Total Carb** 2g (1% DV), Dietary Fiber 0g (0% DV), Sugars <1g, **Protein** 0g, Vitamin A (0% DV), Vitamin C (0% DV), Calcium (0% DV), Iron (0% DV), Vitamin K (10% DV). Percent Daily Values (DV) are based on a 2,000 calorie diet.

INGREDIENTS: SOYBEAN OIL, WATER, VINEGAR, HIGH FRUCTOSE CORN SYRUP, EGGS, SUGAR, MODIFIED FOOD STARCH, STARCH, SALT, MUSTARD FLOUR, POTASSIUM SORBATE AS A PRESERVATIVE, SPICE, PAPRIKA, NATURAL FLAVOR

KRAFT FOODS NORTH AMERICA, INC., DIST., GLENVIEW, IL 60025 USA
(B006B) © KF HOLDINGS
FAT PER SERVING: THIS PRODUCT 5g; MAYONNAISE 11g

JULY 23, 2001
7/16 OZ. MIRACLE WHIP
P.C. POUCH (BACK)
FS-G02-66371-0-7.ai
DP # 5614

CODE NO. 45 6316 7/27/00
DWG. NO. 112436-1 6/25/97
LCC NO. 217932 3/19/01

MANDATORY COLORS

KRAFT BLUE

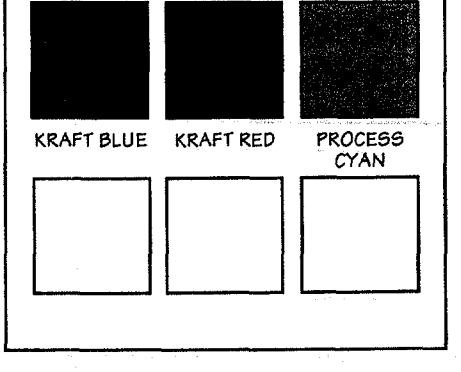
10

30 lbs. Carton
UPC 64703

JULY 23, 2001
30 LB. MIRACLE WHIP LABEL
FS-G02-64703-0-5.ai
DP # 5614

CODE NO. 14 5612 12/5/95
DWG. NO. 111785 11/8/95
LCC NO. 217932 3/19/01

MANDATORY COLORS



30 lbs. Pail
UPC 64705

JULY 23, 2001
30 LB. MIRACLE WHIP
LABEL (GARLAND)
FS-G02-64705-0-7.ai
DP #5614

CODE NO. 14 5612 12/5/95
DWG. NO. 111785 11/8/95
LCC NO. 217932 3/19/01

MANDATORY COLORS

KRAFT BLUE	KRAFT RED	PROCESS CYAN

12A

12A

1 Gallon Plastic Jar - FRONT
UPC 64700

FEBRUARY 7, 2001
1 GALLON MIRACLE WHIP
FRONT LABEL
FS-G02-64700-0-4.ai

CODE NO. 10 5711 6/25/96
DWG. NO. 77052 6/17/96
LCC NO. 190701 2/16/00

Foodservice Package Approval

Business Manager _____

Marketing Services _____

Legal FDA _____

TM _____

Regulatory Compliance _____

Signature Date Comments

MANDATORY COLORS

KRAFT BLUE | KRAFT RED | PROCESS CYAN

DATE 6/29/01 TIME: 11.44a CLIENT # 10129	R1	Artist 2	Studio Manager Quality Checked - 1/11/01	
FILE NAME: FS-G02-64700-0-4.ai JOB # 127800		Proof #1	Proof #2	Account Mng./Exec.
ADS: aw/JR/JG				

12B

1 Gallon Plastic Jar - BACK
UPC 64700

JULY 23, 2001
1 GALLON MIRACLE WHIP
BACK LABEL
FS-G02-64700-0-8.ai
DP # 5614

CODE NO. 10 5711 6/25/96
DWG. NO. 77052 6/17/96
LCC NO. 217932 3/19/01

MANDATORY COLORS

KRAFT BLUE | KRAFT RED | PROCESS CYAN

13

32 lbs. Carton
UPC 64740

KEEP
REFRIGERATED
DO NOT FREEZE

KRAFT®

2100064740

Miracle Whip®

SALAD DRESSING

INGREDIENTS: SOYBEAN OIL, WATER, VINEGAR, HIGH FRUCTOSE CORN SYRUP, EGGS, SUGAR, MODIFIED FOOD STARCH, STARCH, SALT, MUSTARD FLOUR, POTASSIUM SORBATE AS A PRESERVATIVE, SPICE, PAPRIKA, NATURAL FLAVOR

KRAFT FOOD INGREDIENTS, DIST.
MEMPHIS, TN 38101

000resource000

Ⓚ Pareve

85% PRESS DIRECTION

0 21000 64740 8

NET WT 32 LBS
(14.51 kg)

JULY 23, 2001
32 LB. MIRACLE WHIP
LABEL
IN-G02-64740-0-1.ai
DP# 5614

CODE NO. 14 5612 12/5/95
DWG. NO. 111785 11/8/95

MANDATORY COLORS

BLACK

14

50 lbs. Plastic Bag
UPC 72725

14

KRAFT®

Miracle Whip®

Salad Dressing

Nutrition Facts	Amount/Serving	%Daily Value*	Amount/Serving	%Daily Value*
Serving Size 1 Tbsp (15g)	**Total Fat** 6g	9%	**Total Carbohydrate** 2g	1%
Servings Per Container 1512	Saturated Fat 1g	5%	Dietary Fiber 0g	0%
	Cholesterol <5mg	1%	Sugars <1g	
	Sodium 100mg	4%	**Protein** 0g	
Calories 60				
Calories from Fat 50	Vitamin A 0% • Vitamin C 0% • Calcium 0% • Iron 0% • Vitamin K 15%			

*Percent Daily Values are based on a 2,000 calorie diet. Your Daily Values may be higher or lower depending on your calorie needs:

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholest	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carb		300g	375g
Dietary Fiber		25g	30g

INGREDIENTS: SOYBEAN OIL, WATER, VINEGAR, HIGH FRUCTOSE CORN SYRUP, EGGS, SUGAR, MODIFIED FOOD STARCH, STARCH, SALT, MUSTARD FLOUR, POTASSIUM SORBATE AS A PRESERVATIVE, SPICE, PAPRIKA, NATURAL FLAVOR

KRAFT FOODS NORTH AMERICA, INC., GLENVIEW, IL 60025 USA (B001A)

1 00 21000 72725 1

ACTUAL SIZE

1-50 LB (22.68 kg) BAG

15

430 lbs. Drum
UPC 70551

15

DIRECTION OF FEED
GRAIN DIRECTION
UNWIND #3

10.000

5.500

KEEP REFRIGERATED
DO NOT FREEZE

2100070551

KRAFT

Miracle Whip

SALAD DRESSING

Ⓚ Pareve

INGREDIENTS: SOYBEAN OIL, WATER, VINEGAR, HIGH FRUCTOSE CORN SYRUP, EGGS, SUGAR, MODIFIED FOOD STARCH, STARCH, SALT, MUSTARD FLOUR, POTASSIUM SORBATE AS A PRESERVATIVE, SPICE, PAPRIKA, NATURAL FLAVOR

KRAFT FOOD INGREDIENTS, DIST.
MEMPHIS, TN 38101

NET WT 430 LBS
(195.04 kg)

000resource000

100% PRESS DIRECTION

0 21000 70551 x

MANDATORY COLORS

BLACK

JULY 23, 2001
430 LB. MIRACLE WHIP
SHIPPER LABEL
IN-G02-70551-0-1.ai
DP #5614

CODE NO. 14 0057 3/29/99
DWG. NO. LAB/G1092 3/16/99