

FSIS Updates Multi-Component Kit Guideline

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- As our readers may [recall](#), in July of 2019, the USDA's Food Safety and Inspection Service (FSIS) issued a notice of availability and a request for comment on a new guideline for establishments producing multi-component kit products that contain meat or poultry products. On September 21, FSIS [announced](#) updates to the guideline and responded to comments received in 2019. FSIS intends for the guideline to help establishments and other food handling facilities determine whether the kit product needs to be prepared under FSIS inspection and how to label a kit product that contains fully labeled meat or poultry components.
- FSIS received 15 comments on the guideline, mainly from firms that prepare kits and trade associations that represent the meat and retail industries. Comments, and FSIS responses, covered a range of topics, including:
 - One comment requested that FSIS provide a clearer definition of a kit and clarify whether Agency policy distinguishes between a kit and a meal kit. FSIS reiterated that a kit product consists of individually packaged meat or poultry components and other food components sold together as a single unit. FSIS policy does not distinguish between the terms "kit" or "meal kit."
 - One comment sought clarification on whether FSIS inspection and label approval requirements apply to firms that receive and further process bulk product as part of final kit assembly. FSIS updated the guideline to clarify that Agency guidance on the preparation of kit products without FSIS inspection does not apply when the meat or poultry component is processed, including portioned or packaged, by the firm assembling the kit.
 - One FSIS employee commented to ask for clarification whether a kit may be assembled under voluntary inspection and bear a USDA inspection legend. FSIS confirmed that the assembly of a kit product is eligible for voluntary inspection as a food inspection service under 9 CFR 350.3(c).
- FSIS noted that the guideline represents the Agency's current thinking on multi-component kit products and will be updated as necessary.

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