

**CERTIFIED MAIL  
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19900 MacArthur Blvd., Ste 300  
Irvine, California 92715-2445  
Telephone (714) 798-7600

**WARNING LETTER**

May 29, 1996

NL-41-6

Patricia Bragg  
President  
Live Food Products Inc.,  
7340 Hollister Avenue  
Goleta, CA. 93117

Dear Ms. Bragg:

Our review of the labeling for your ALL NATURAL BRAGG AMINOS ALL PURPOSE SEASONING manufactured by your firm reveals that the product is in violation of Federal Food, Drug, and Cosmetic Act within the meaning of Section 403(a)(1) in that the product's label bears the phrase "NO MSG," however, based on laboratory analysis the product contains glutamate.

The product is further misbranded within the meaning of Section 403(e)(1) because the product in package form fails to bear the name and place of business of the manufacturer, packer, or distributor as required by 21 CFR 101.5.

All of the mandatory label information must appear on the principal display or information panel.

The product is further misbranded under 403(q)(1) of the Act, in that the declared serving size of 1/2 tsp (2.5 ml) is not based on the established reference amount customarily consumed (1 tablespoon). Because the labeled serving size is only one-sixth of the required amount, the nutrient levels declared in the "Nutrition Facts" panel are only one-sixth the amount they should be which significantly misrepresents the nutrient profile of this product. Furthermore, by declaring the amount of protein in milligrams instead of grams, it appears that the product contains more protein than is actually present in the food.

The product is further misbranded under 403(r)(1)(A) of the Act because the label bears a 'no salt added' claim, "No table salt is added," but the product is not sodium free, and the label fails to state either "not a sodium free food" or "not for control of sodium in the diet" as required by 21 CFR §101.61(c)(2).

The product is further misbranded under section 403(r)(1)(A) of the Act in that the word "contains" implies and suggests that the product is a "good source" of the sixteen amino acids listed on the label. As such, the statement "CONTAINS THE FOLLOWING AMINO ACIDS" followed by a listing of amino acids source claim that is not permitted for nutrients which do not have an established daily reference value or reference daily intake.

The product is further misbranded under section 403(r)(1)(A) of the Act in that the label bears the nutrient content claim "Healthy," but fails to comply with the sodium level established by the regulation for individual foods designated as "Healthy." Since the reference amount for the product is small, 30 g or less or 2 tablespoons or less, it may only bear the "healthy" claim on its label, if it contains no more than 360 mg of sodium per 50 g, and meets all other requirements of the healthy definition. We point out that based on the recommended reference amount of 1 tablespoon, the sodium content exceeds the 360 mg level, and therefore, the product does not qualify for the use of the term healthy on its label.

The product is further misbranded under 403(i)(2) of the Act, in that it is fabricated from two or more ingredients, but the ingredient statement fails to bear the common or usual name of each ingredient as set forth in 21 CFR §101.4. We do not consider "Bragg formulated vegetable protein from pure soybeans only" to be an appropriate common or usual name for an ingredient. Additionally, the statements "Contains no preservatives, no coloring agents, no additives, no alcohol, no chemicals, no MSG" and "This product is not fermented" should not appear as part of the ingredient statement.

If "ALL PURPOSE SEASONING" is the name of the food, the product is misbranded under 403(f) of the Act, because the name "ALL PURPOSE SEASONING" fails to appear prominently and conspicuously on the label whereby it is likely to be read and understood by the ordinary consumer. The term "ALL PURPOSE SEASONING" is also crowded with other written and graphic matter and fails to appear in a type size reasonably related to the most prominent printed matter on the principal display panel.

Additionally, the statement "\*\*\* Protein (amino acids) from soybeans" should be deleted from inside the Nutrition Facts panel because no nutrients or food components other than

those provided for in the regulation under 21 CFR §101.9 as either mandatory or voluntary may be included within the nutrition label.

It is your responsibility to assure that all of your product labeling is in compliance with the requirements of with the laws and regulations.

You should take prompt action to correct these violations. Failure to promptly correct these violations may result in regulatory action without further notice, such as seizure.

Within 15 working days of receipt of this letter, notify this office in writing of the specific steps you have taken to correct the noted violations, including an explanation of each step being taken to prevent the recurrence of similar violations.

Your reply should be addressed to:

Dannie E. Rowland  
Compliance Officer  
U.S. Food and Drug Administration  
19900 MacArthur Boulevard, Suite 300  
Irvine, California 92715

Sincerely,

  
Elaine C. Messa  
District Director

cc: State Department of Public Health  
Environmental Health Services  
Attn: Chief, Food and Drug Branch  
714 "P" Street, Room 440  
Sacramento, CA 95814