



STEPS FOR SUBMISSION OR RE-SUBMISSION OF pH SAMPLES (ACIDIFIED FOODS)



Acidified foods are low-acid foods to which acid or acid food is added. They have a finished equilibrium pH of 4.6 or below and a water activity (A_w) greater than 0.85. Acidified foods include but are not limited to: pickled vegetables and peppers, sauces, salsas, tapenades, marinades, and some beverages. In contrast, 'acid foods' have a natural pH of 4.6 or below.

Commercially processed shelf-stable (non-refrigerated) acidified foods must be packed under a valid Cannery License issued by the California Department of Public Health, Food and Drug Branch (FDB) because, if those foods are not properly acidified, they may support the growth of *Clostridium botulinum*, the organism that causes botulism.

The first step towards determining whether a product is an acidified food that requires a Cannery License is to have the product evaluated by the University of California Laboratory for Research in Food Preservation (UCLRFP). UCLRFP provides scientific and technical expertise related to control of *C. botulinum* under contract with FDB.

This document describes the steps for submitting an acidified food product to UCLRFP for evaluation.

1. Complete a separate "Request for pH Control" form for each product to be evaluated. Please be as specific as possible when you complete the form. The UCLRFP has prepared a document to assist companies to properly complete the "Request for pH Control" form. Please refer to "How to Complete the Request for pH Control Form" for details. It is very important, and ultimately to your advantage, for the UCLRFP to receive very accurate and detailed information about the ingredients, formulation (recipe), process, container and closure system associated with your products. This prevents delays and provides the most accurate evaluation of the products.
2. Prepare the food product according to the formula submitted on the "Request for pH Control" form and pack the food product into the same type of containers that you plan to use to market the product.
3. Retain a copy of the Request for pH Control form for your records.
4. Submit two samples of each product for evaluation. Pack the samples well to avoid breakage and/or leakage during transport to UCLRFP. Please label the samples with the name of the canner and the name of the product. If no samples are available, submit the form and note that no sample was available. Please note that the evaluation process may be delayed if UCLRFP does not receive samples of your product(s).

5. Send the completed “Request for pH Control” form and samples to:

University of California Laboratory for Research in Food Preservation (UCLRFP)
ATTN: NEW PRODUCTS
4055 Nelson Avenue
Concord, CA 94520

6. The evaluation may take between 4-6 weeks. Once UCLRFP has completed the evaluation, the information will be sent to FDB. Please **do not** contact UCLRFP to request the results of the evaluation.
7. FDB will issue you an official process letter (called an S-Letter) for each product submitted to UCLRFP. The S-letter will inform you whether the product is an acidified food that must be packed under a valid Cannery License. Refer to “What Does My Official Process Letter (S- Letter) Mean?”
8. If any of your products require a Cannery License, please refer to the “Procedure for Obtaining a Cannery License” and submit the Cannery License application form.

Important Notes:

If a Cannery License is not required, the product will need to be manufactured, packed, and held (stored/warehoused) under a **valid Processed Food Registration (PFR) issued by FDB**. Please refer to the PFR webpage for information about the PFR program requirements and to obtain a PFR application form.

Your product formulation is protected under the law. Specifically, California Health and Safety Code Section 110165 states that it is unlawful for any person to use to his own advantage, or to reveal to any person other than to the director or officers or employees of this department, or to the courts when relevant in any judicial proceeding under this division, any information acquired under authority of this division concerning any method or process which as a trade secret is entitled to protection

Re-submittal of samples for evaluation

Sample testing and evaluation is paid for out of a fund established by licensed California canners. The purpose of the fund is to provide an initial evaluation of acidified food products in order to determine whether those products require packing under a valid Cannery License. The fund is **not** set up to support re-submittals of the same product while a company makes formulation, process, or other changes.

Therefore, if you want to re-submit products to the laboratory for evaluation, but you do **not** hold a valid Cannery License, you will be charged a fee to cover the re-testing/re-evaluation service.

Follow the steps below to have your product(s) re-evaluated:

1. Complete a separate “Request for pH Re-Evaluation” form for each product to be re-evaluated. Describe in detail the changes made to the ingredients,

formulation, process, container, etc. **Please be sure to include the S number from the prior evaluation.**

2. Complete the “Request for pH Re-Evaluation Cover Letter” which includes your name, address, contact information, and product name/description.
3. Prepare the food product according to the formula submitted on the “Request for pH Re- Evaluation” form and pack the food product into the same type of containers that you plan to use to market the product.
4. Retain a copy of the “Request for pH Re-Evaluation” and “Request for pH Re-Evaluation Cover Letter” for your records.

Submission

1. Submit two samples of each product for evaluation. Pack the samples well to avoid breakage and/or leakage during transport to UCLRFP. Please label the samples with the name of the canner and the name of the product. If no samples are available, submit the form and note that no sample was available. Please note that the evaluation process may be delayed if UCLRFP does not receive samples of your product(s).
2. Include a check or money order made payable to the **California Department of Public Health**. The fee will be \$60 per product submitted. This fee for service covers the cost of basic product testing and evaluation (\$30/hour) for two hours (the average time required for testing and evaluation activities) per product re-submitted.
3. Send the completed “Request for pH Re-Evaluation” form, “Request for pH Re-Evaluation Cover letter, two samples of each product and payment of the fee to:

University of California Laboratory for Research in Food
Preservation (UCLRFP) ATTN: NEW PRODUCTS
4055 Nelson Avenue
Concord, CA 94520

4. The evaluation may take between 4-6 weeks. Once UCLRFP has completed the evaluation, the information will be sent to FDB. Please **do not** contact UCLRFP to request the results of the evaluation.
5. FDB will issue an S-Letter for each product re-submitted to UCLRFP. The S-letter will inform you whether the product is an acidified food that must be packed under a valid Cannery License. Refer to “What Does My Official Process Letter (S-Letter) Mean?”
6. If any of your products require a Cannery License, please refer to the “Procedure for Obtaining a Cannery License” and submit the Cannery License application form.