

Maple Dealer and Processor Inspection Program

Questions and Answers

1. What is the goal of the Maple Dealer and Processor Inspection program?

The goal of the program is to support the maple industry and its consumers by ensuring the safety, quality, and accurate labeling of maple products produced by licensed maple dealers and processors.

2. What does the Maple Dealer and Processor Inspection Program do?

The program provides education and technical assistance to licensees on the requirements of the [Vermont Maple Law, 6 V.S.A. Chapter 32](#), and the [Maple Regulations, V.C.R. 20-211-002](#), and conducts inspections to ensure those requirements are followed.

3. Who requires a maple dealer or processor license?

All maple dealers and processors doing business in Vermont, or who wish to do business in Vermont, must obtain an annual license from the Vermont Agency of Agriculture, Food, and Markets (the Agency). Visit agriculture.vermont.gov/license-and-registrations to apply for or renew a license.

“Dealer” means a person who annually buys, or otherwise acquires from another person, 1,000 gallons of maple syrup or more for purposes of packaging for resale or for resale in bulk. 6 V.S.A. § 481.4.

“Processor” means a person who annually buys, or otherwise acquires from another person, 2,500 gallons of maple syrup or more for purposes of packaging for resale, processing into associated products, or for resale in bulk. 6 V.S.A. § 481.19.

4. What types of inspections does the program perform?

The two types of inspections include on-site and records-only inspections.

On-Site Inspections

The program conducts on-site inspections of facilities located in Vermont that licensees use to store, transport, process, and/or pack maple products. An inspection involves the review all applicable [Maple Dealer and Processor Inspection Criteria](#), including required records.

Records-Only Inspections

The program conducts records-only inspections of licensees who are located outside Vermont. An inspection involves the request and review of records required under the Vermont Maple Law and Regulations.

5. What are the key requirements?

Inspection requirements are grouped into four topic areas, which include food safety, quality standards, labeling, and records. Below are summaries of key requirements for each topic. See the [Maple Dealer and Processor Inspection Criteria](#) for a full list of requirements.

Food Safety

- A licensee must not manufacture, package, sell, offer for sale, deliver, or in any way possess any maple product that is adulterated. 6 V.S.A. § 491(a).
- A licensee must use only approved methods for filtering maple syrup. Approved methods include simple filtration through cloth or paper, a filter press, or food grade diatomaceous earth. 6 V.S.A. § 491(b).

Hazards that may cause adulteration of maple products include physical hazards (such as glass or metal fragments), chemical hazards (such as leaching from lead-containing equipment, non-food grade diatomaceous earth, or misuse of cleaning supplies), or biological hazards (such as illness-causing mold, bacteria, viruses, or parasites).

Requirements of the [Vermont Manufactured Food Rule](#), [FDA Preventive Controls for Human Foods Rule](#), or other similar food safety programs are outside the scope of the Maple Dealer and Processor Inspection program. However, a licensee may refer to those programs for examples of best practice, and may use protocols and records developed for those programs to demonstrate they have taken measures to prevent adulteration of maple products in compliance with 6 V.S.A. § 491(a).

Quality Standards

A licensee must meet the following quality standards:

- Packaged maple syrup must meet Grade A standards for color, flavor, clarity, and density. “Packaged maple syrup” means maple syrup packed in containers of five gallons or less.
- Processing grade maple syrup must not be sold as Grade A nor as packaged maple syrup. Processing grade includes pure maple syrup which does not meet Grade A standards and is not adulterated.
- Bulk maple syrup may be sold at a lower minimum density than Grade A maple syrup provided that the container shall be conspicuously marked with the following sentence:

Notice - The syrup contained herein fails to meet state density standards. The density is ____ degrees Baume at 60 degrees Fahrenheit.

Labeling

A licensee must meet labeling requirements, including:

- Packaged maple syrup must be labeled with the name and address of the packer, the true name of the product (e.g., maple syrup), the grade, the volume, and a batch code.

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- Maple products (other than maple syrup) must be labeled with the name and address of the packer, the true name of the product (e.g., maple sugar), and the volume or net weight.
- Maple flavored products must be labeled with the name and address of the producer. If the product is a liquid, it must include the percentage of maple syrup used in the product by volume. If the product is a solid, the label must include maple syrup in the ingredients list.
- A product that does not contain real maple syrup or maple sugar must not use the terms “maple syrup” or “maple sugar” on labels or in advertising. Terms such as “artificial maple flavor” or “artificial maple flavor sweetener” may be used to describe a product flavored or sweetened with a substance that attempts to duplicate real maple flavor.
- The term “Vermont maple” may be used only to describe any product, flavoring, sweetener, or food additive when the product, flavoring, sweetener, or food additive contains maple products that are produced in Vermont in their entirety from pure, unprocessed maple sap.

While outside the scope of Maple Dealer and Processor inspections, a licensee should also be aware of other applicable state and/or federal food labeling requirements, such as nutritional labeling, allergen declaration, weights and measures labeling, [and Act 129 - Vermont Local Food Definition](#).

Records

Unless exempt (see #6), a licensee must maintain records that include:

- Names and addresses of all persons that the licensee purchased maple syrup from within the past calendar year and the amount of maple syrup purchased from each.
- Samples of all labels and containers that the licensee used in connection with the sale of packaged maple syrup and maple products and all labels that licensee used in connection with bulk maple syrup sales in the past calendar year.

A licensee must keep records for at least three years and make records available during an inspection and upon request.

6. Are there any exemptions?

Yes. A licensee may apply for an exemption from record-keeping requirements in Section II.3 of the [Regulations](#).

To be eligible for a records exemption, a licensee must not label maple syrup or maple products in any way which states or implies that the maple syrup or maple products were produced in Vermont.

A licensee must apply for a records exemption at the same time as they initially obtain and renew their annual maple dealer or processor license. To apply for a records exemption, a licensee must submit copies of all maple product labels and containers so that the program can verify their exemption eligibility.

7. When will inspections begin?

Inspections for licensed maple processors will begin in July 2025.

Inspections for licensed maple dealers will begin in January 2026.

8. Are inspections pre-announced?

Routine inspections will be pre-announced and scheduled with licensees. Non-routine inspections, such as for-cause inspections, are not pre-announced.

9. Will I receive anything after an on-site inspection?

Yes. The Agency inspector will provide a copy of the inspection form at the end of each inspection. The inspection form will document any items that are not in compliance at the time of inspection, as well as any corrective actions the licensee took to address those items during the inspection.

10. How will noncompliance items be handled?

A licensee's initial inspection will be educational in nature and will focus on providing technical assistance regarding key requirements.

During a non-initial inspection, the inspector will review all applicable inspection criteria, provide technical assistance as needed, and discuss any noncompliance item which were identified during the inspection with the licensee. The inspector will then request that adequate corrective actions are taken within an appropriate timeframe.

A licensee is encouraged to make their corrective actions during the inspection whenever possible so the inspector can verify the adequacy of those corrections. A licensee should report any remaining corrective actions they take after the inspection within two weeks of the date that they take them. A corrective action report may include plans and timelines for implementing corrective actions that will occur in the future. A licensee may use the Corrective Action Report Template available at <https://agriculture.vermont.gov/food-safety/maple-products> to submit their report.

If a licensee does not take adequate corrective action within an appropriate timeframe, and/or if repeat violations are found, the Agency may take administrative enforcement action available under [6 V.S.A. § 15](#). This may include the Agency issuing a corrective action letter and/or a notice of violation in which the Agency seeks monetary penalties.

11. Where is more information about the program?

Visit the Maple Dealer and Processor Inspection Program pages on the Agency website at <https://agriculture.vermont.gov/food-safety/maple-products>.

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FOOD SAFETY

<i>Citation</i>	<i>Topic</i>	<i>Requirements</i>
6 V.S.A. § 491(a)	Adulteration, maple products	No person shall manufacture, package, sell, offer for sale, deliver, or in any way possess any maple product that is adulterated within the meaning of 18 V.S.A. § 4059.
6 V.S.A. § 491(b)	Filtration, maple syrup	Maple syrup shall not be bleached or lightened in color by artificial means except by simple filtration through cloth or paper, through a filter press, or through food grade diatomaceous earth with a filter press to remove suspended solids.
6 V.S.A. § 494(b)	Containers and equipment (maple products), sanitary requirements	Containers and equipment used for packaging maple products shall be clean and sanitary at the time of packing.
C.V.R. 20-011-002, Section VI.1	Containers (maple syrup), seals	All packaged maple syrup containers shall have tamper proof seals which have been approved by the Secretary placed over the container openings except: a) Where the Secretary has deemed that it is impractical to use tamper proof seals on a particular container, or b) Where the package has been opened for inspection by the Secretary or their inspectors.
C.V.R. 20-011-002, Section VI.2	Containers (maple syrup), sanitary	All maple syrup containers shall be clean, sanitary and free from rust and shall not contain or be constructed of any substance which could tend to damage the color or flavor of the maple syrup.
C.V.R. 20-011-002, Section VI.3	Containers (maple syrup), airtight	The cap or other closing mechanism of any maple syrup package must be so tightened as to render the contents airtight.
C.V.R. 20-011-002, Section VI.4	Containers (maple syrup), conditions for embargo	Packaged maple syrup packed in or found to be in bulged, rusty, unsealed, unsanitary, seriously damaged containers, or containers which are not permanently airtight shall be unlawful and will be subject to embargo, or other remedies provided for by the law.

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C.V.R. 20-011-002, Section VI.5	Containers (maple syrup), prohibited containers	Maple syrup containers determined by the Secretary to cause damage to maple syrup shall be removed from sale. The use of such containers for packaging maple syrup is prohibited.
C.V.R. 20-011-002, Section VI.6	Containers (maple syrup), bulk container cleaning	All bulk maple syrup containers shall be steam cleaned or sterilized with hot water prior to being filled with maple syrup. Such containers shall be free of water at the time they are filled with maple syrup.

RECORDS

<i>Citation</i>	<i>Topic</i>	<i>Requirements</i>
C.V.R. 20-011-002, Section II.3	Required records, records retention	A dealer or processor shall maintain all records necessary to prove the statistical information required by the Act and by these regulations for a period of at least three years. Those records shall include the names and addresses of all persons from whom maple syrup was purchased and the amount of maple syrup purchased. The dealer or processor shall also maintain samples of each and every label and container used in connection with the sale of packaged maple syrup and maple products; they shall maintain samples of each and every label used in connection with bulk maple syrup sales. All such records shall be made available to the Secretary upon request. Failure to maintain adequate records as required by the Act and by these regulations shall constitute sufficient cause for the Secretary to suspend, revoke or refuse to grant that dealer or processor a license.
C.V.R. 20-011-002, Section II.4	Records exemption	The Secretary may, at their discretion, exempt a dealer or processor from the foregoing record keeping requirements where they find that the dealer or processor has not, and will not, label their maple syrup or maple products in any way which states or implies that the maple syrup or maple products were produced in Vermont. In order to apply for such an exemption, a dealer or processor shall annually request that status at the time they re-apply for the dealer or processor's license. They shall provide the Secretary with copies of all labels and containers used during the preceding year and with copies of any changes intended to be made to those labels or containers. Upon review, if the Secretary determines that the labels and containers do not state or imply that the maple products were produced in Vermont, they may grant that dealer or processor a one-year exemption from the record keeping requirements.

MAPLE SYRUP QUALITY GRADE STANDARDS

<i>Citation</i>	<i>Topic</i>	<i>Requirements</i>
C.V.R. 20-011-002, Section III.1(a)	Grade A – Golden Color / Delicate Taste	"Golden Color / Delicate Taste" means pure maple syrup which is free of any material other than pure, clear, clean liquid maple syrup in sanitary condition; which has a color no darker than the United States Department of Agriculture's visual color standard Golden Color, or has a color for light transmittance not less than 75.0%Tc; which has a delicately sweet, original maple flavor characteristic; and which has a density ranging from the equivalent of 36 degrees Baume (66.9 degrees Brix) to 37 degrees Baume (68.9 degrees Brix) at 60 degrees Fahrenheit Modulus 145. Golden Color / Delicate Taste maple syrup shall be free of sugar crystals and shall not be damaged in any way.
C.V.R. 20-011-002, Section III.1(b)	Grade A – Amber Color / Rich Taste	"Amber Color / Rich Taste" means pure maple syrup which is free of any material other than pure, clear, clean liquid maple syrup in sanitary condition; which has a color no darker than the U.S. Department of Agriculture visual standard, Amber Color, or has a color for light transmittance between the range of 74.9%Tc to 50%Tc; it may have a flavor which is more pronounced than that of Golden Color / Delicate Taste, but which is not strong or unpleasant. Amber Color / Rich Taste maple syrup shall be free of sugar crystals and shall not be damaged in any way.
C.V.R. 20-011-002, Section III.1(c)	Grade A – Dark Color / Robust Taste	"Dark Color / Robust Taste" means pure maple syrup which is free of any material other than pure, clear, clean liquid maple syrup in sanitary condition; which has a color no darker than the United States Department of Agriculture visual standard Dark Color, or has a color for light transmittance between the range of 49.9% Tc to 25% Tc; it may have a flavor which is stronger than that of Amber Color / Rich Taste, but which is not sharp, bitter, buddy or off flavor. Dark Color / Robust Taste shall be free of sugar crystals and shall not be damaged in any way.
C.V.R. 20-011-002, Section III.1(d)	Grade A – Very Dark Color / Strong Taste	"Very Dark Color / Strong Taste" means pure maple syrup which is free of any material other than pure, clear, clean liquid maple syrup in sanitary condition; which has a color for light transmittance less than 25% Tc. (The United States Department of Agriculture does not have an approved visual glass comparator which compares to the light transmittance of this grade. Very Dark Color / Strong Taste may have a flavor stronger than Dark Color / Robust Taste, but shall not be damaged in any way and shall be free of sugar crystals.

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C.V.R. 20-011-002, Section III.2	Processing grade (formerly "Grade B")	"Processing Grade" means pure maple syrup with objectionable odors or flavors and cannot be graded as Grade A. Processing Grade shall not be placed in packaged maple syrup containers and may not be sold, offered for sale, or exposed for sale as packaged maple syrup.
C.V.R. 20-011-002, Section III.8(a)	Density, minimum	All grades of packaged maple syrup shall have a minimum density matching its temperature, which is equivalent to 36 degrees Baume Modulus 145 or 66.9 degrees Brix at 60 degrees Fahrenheit on instruments calibrated at 60 degrees Fahrenheit or other equivalent measurement of density.
C.V.R. 20-011-002, Section III.8(b)	Density, maximum	Packaged maple syrup shall have the equivalent of a maximum density of not more than 37 degrees Baume or 68.9 degrees Brix at 60 degrees Fahrenheit.
C.V.R. 20-011-002, Section III.8(e)	Density, bulk minimum	The density of bulk maple syrup may range from the equivalent of 35.5 degrees Baume (65.9 degrees Brix) to 37 degrees Baume (68.9 degrees Brix) when the syrup temperature is 60 degrees Fahrenheit. When the density of bulk maple syrup does not fall within this range the container shall be conspicuously marked "Notice - The syrup contained herein fails to meet state density standards. The density is ____ degrees Baume at 60 degrees Fahrenheit." The accurate density for the syrup within the bulk container shall be stated.
C.V.R. 20-011-002, Section III.8(f)	Density, bulk sold for retail	Bulk maple syrup sold directly to consumers, restaurants or any other market where the syrup is not further processed before purchase by the consumer shall meet the same density standards as packaged maple syrup.

LABELING

<i>Citation</i>	<i>Topic</i>	<i>Requirements</i>
<i>General</i>		
6 V.S.A. § 493(a)	Labeling, use of the term "Vermont maple"	The term "Vermont maple" may be used only to describe any product, flavoring, sweetener, or food additive when the product, flavoring, sweetener, or food additive so described contains "maple products" that are "produced in Vermont" as those terms are defined in this chapter.
C.V.R. 20-011-002, Section V.1	Labeling, untruthful, unfair, or deceptive	No person shall label any maple syrup, maple product, maple flavored product, or artificial maple flavored product in any manner which is untruthful, unfair, or deceptive.

Maple Syrup		
C.V.R. 20-011-002, Section III.3	Labeling, batch codes	Grade A maple syrup must include a batch code on all retail containers.
C.V.R. 20-011-002, Section III.4	Labeling, grade designation	All maple syrup containers shall have the accurate grade clearly and conspicuously marked upon their principal display panel or other portion of the container most likely to be seen when the container is in its normal display position. Such markings must be in accordance with the requirements of the Act, these regulations, and other applicable state and federal labeling requirements. Only one grade designation may be used on any container. The maple syrup within the container must comply with the minimum standards set by these regulations for that grade. It shall be unlawful for any person to label maple syrup with an inaccurate grade.
C.V.R. 20-011-002, Section III.6	Labeling, word and letter size	All words and letters of the grade designation used shall be of equal size and prominence.
C.V.R. 20-011-002, Section III.7	Labeling, "Vermont" designation	The word "Vermont" (or the abbreviation "Vt.") shall appear in conjunction with the grade on any maple syrup container when the maple syrup therein is 100 percent pure maple syrup which is entirely produced within the State of Vermont. The use of marketing descriptors, such as Vermont Fancy, and other descriptors is allowed. In addition, where the maple syrup within the container was not produced in

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		Vermont the name of the place of origin (that is the state, province, or country) may also be used in conjunction with grade designations.
C.V.R. 20-011-002, Section V.1(b)	Labeling, "Vermont" maple syrup	No maple syrup may be labeled as being a Vermont product, or labeled in any manner which would imply that the maple syrup was produced in Vermont, unless the maple syrup is 100 percent pure maple syrup which was entirely produced within the state of Vermont in compliance with the terms of the Act and these regulations.
C.V.R. 20-011-002, Section V.2	Labeling of bulk containers sold directly to the end user	The labeling requirements of Paragraph 490 (a) of Title 6 V.S.A. Chapter 32. shall not apply to bulk maple syrup containers used solely for transportation or storage of maple syrup prior to being processed or packaged for consumer sales or prior to being manufactured into another maple product. However, all maple syrup in bulk containers sold directly to consumers, restaurants or any other markets where the syrup is not further processed before purchase by the consumer shall be labeled with the same information required on packaged maple syrup.

Maple Flavored Products		
6 V.S.A. § 492(a)	Labeling, maple flavored products	<p>Every product or package containing a product made by combining maple sap, maple sugar, or maple syrup with any other sugar or other substance packed, sold, offered, or exposed for sale or distribution by any person in this State shall be plainly marked in accordance with 9 V.S.A. § 2633(c) for packaging and labeling rules and shall include the following on the principal display panel:</p> <ul style="list-style-type: none"> (1) an accurate and descriptive name; (2) the net quantity contents declaration; and (3) the amount of maple sugar or maple syrup the product contains expressed in percentage of volume if the product is a liquid or a list of the product ingredients in order of decreasing predominance by weight if the product is a solid. The percentage statement or ingredient list shall be in close proximity to the product name.

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6 V.S.A. § 492(b)	Labeling, maple flavored product advertisements	The same information required in 6 V.S.A. § 492(a) shall be included in any advertisements of the product. When the product is served in any public eating place, the menu shall be conspicuously marked with an accurate and descriptive name and a statement expressing the percentage of maple sugar or maple syrup the product contains.
6 V.S.A. § 492(c)	Labeling, maple flavored products, use of the term "maple"	The words "maple," "mapyl," "mapley," or words of similar import shall not appear in any manner on a container, label, menu, or advertisement of maple flavored products, unless: (1) such words are printed in the statement of contents together with the percentage; (2) such words are a part of the packer's name, provided that the packer's name cannot appear to be a part of the product name; or (3) the words "blend," "sweetened," or "flavored" appear immediately before, after, above or below and in equal prominence to such words.
6 V.S.A. § 492(d)	Labeling, maple flavored products, use of the term "maple flavored"	The term "maple flavored" may only be used when 100 percent of the flavoring material is a pure maple product. If any artificial maple flavor is used, the label shall clearly and conspicuously state "artificial flavor."
C.V.R. 20-011-002, Section V.1(d)	Labeling, maple flavored products	All maple flavored products shall be clearly labeled on their principal display panel or panels in a manner which will alert the purchaser to the fact that the product is not a 100 percent pure maple product, in accordance with the Act and other applicable statutes and regulations, such as CP 120.

Artificial Maple Flavored Products		
6 V.S.A. § 493	Labeling, artificial maple flavored products	It shall be unlawful to use the term "maple syrup" or "maple sugar," however modified, to describe any product, flavoring, sweetener, or food additive unless the product, flavoring, sweetener, or food additive so described meets the statutory definition of "maple syrup" or "maple sugar." Terms such as "artificial maple syrup" or "artificial maple sugar" are declared to be misleading and deceptive and may not be used in the labeling or advertising of any product. Terms such as "artificial maple flavor" or "artificial maple flavor sweetener" may be used to describe a product flavored or sweetened with a substance that attempts to duplicate real maple flavor, providing that words such as "artificial," "flavor," and other

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		<p>modifiers of the word “maple” shall appear in equal prominence to the word “maple” on the label and in all advertising of the product.</p>
<p>C.V.R. 20-011-002, Section V.1(e)</p>	<p>Labeling of artificial maple flavored products</p>	<p>Artificial maple flavored products shall be clearly and conspicuously labeled on their principal display panel or panels with the term "artificial flavor" shall be of a size equal to, or larger than, other words used to describe the product. It is unlawful to use the terms "maple syrup" or "maple sugar," however modified, to describe an artificially flavored product. Any restaurant menu listing such a product, or any advertising of such a product shall clearly state that the product is artificially flavored.</p>

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References

Vermont Maple Law (6 V.S.A. Chapter 32), <https://legislature.vermont.gov/statutes/chapter/06/032>

Maple Product Regulations (C.V.R. 20-211-002),
https://agriculture.vermont.gov/sites/agriculture/files/documents/Maple_Products/CVR%2020%20011%20002%20MAPLE%20PRODUCTS%20REGULATIONS%20%287-19%29.pdf

Vermont Manufactured Food Rule, <https://www.healthvermont.gov/sites/default/files/document/reg-manufactured-food.pdf>

FDA FSMA Preventive Controls for Human Foods Rule, <https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-final-rule-preventive-controls-human-food>