

Producing and Selling a Packaged Meat-Containing Product in Minnesota



Retail versus Wholesale Regulations

In the food industry, retail channels sell products directly to consumers through stores, online platforms, or farmers markets. Wholesale channels sell in bulk to businesses like restaurants, institutions, or retailers, who then resell or use the products. Meat-containing products are regulated depending on the intended sales channel of the processor. Retail licenses allow direct sales to end consumers and some sales to institutions (up to 25% of total sales) without the need for continuous inspection.^{1,2} Wholesale production of meat-containing products with greater than 2% meat by weight in the formulation requires oversight by the Minnesota Department of Agriculture (MDA) or the United States Department of Agriculture (USDA) with more rigorous, continuous inspections and licensing. Continuous inspection means that the business's process is inspected daily during operations to ensure that it is producing safe food. Selling in wholesale distribution will also require an MDA Wholesale Food Manufacturing License.³

Individual cities may also have specific licensing or additional restrictions for retail or wholesale food operations. Always consult city ordinances to ensure compliance. Minneapolis offers a Micro-Food Wholesaler license, which allows for very limited wholesale sales to other retailers within the city limits only, without the need for continuous inspection.⁴

“Equal To” versus USDA Oversight

Minnesota is one of 29 states currently operating a Meat and Poultry Inspection Program (MPIP), considered at least equal to the federal meat and poultry inspection program. This means that the state “Equal To” (E2) inspection program meets USDA standards but producers can only sell, distribute, and wholesale to other entities within the state of Minnesota. Federal USDA inspection is required to sell across state lines.^{1,5} Choosing between the two depends on business size, scheduling flexibility, intended market(s) and more. These factors are summarized in Table 1.

TABLE 1: COMPARISON OF MINNESOTA “EQUAL TO” MEAT INSPECTION VERSUS USDA CONTINUOUS INSPECTION

FACTOR*	“EQUAL TO” PROGRAM	USDA CONTINUOUS INSPECTION
Jurisdiction	In-state sales only	Nationwide sales
Oversight	State agency, USDA oversight	USDA Food Safety and Inspection Service (FSIS)
Inspector Presence	More flexible	Mandatory during all operations
Support	Closer technical assistance	Less personalized
Best For	Local/regional businesses	Businesses with national ambitions

* Cost is not included as a factor for comparison. Inspection itself is not a direct cost to the business; instead, it is a state- or federally-funded service. However, businesses will incur an additional cost if inspections are required on a holiday or outside standard working hours. Additionally, a desk or office location must be provided by the business for the inspector, which could be an additional construction cost.⁵

Food Safety Plan Requirements

A Hazard Analysis and Critical Control Points (HACCP) plan is required for wholesale meat operations. This ensures that food safety hazards are identified and controlled during production. HACCP (pronounced “hass-sup”) is a management system in which food safety is addressed through the analysis and control of biological, chemical, and physical hazards from raw material production, procurement, and handling, to manufacturing, distribution, and consumption of the finished product.^{7,8,9,10} HACCP training and certification can be accomplished in-person (the University of Minnesota Extension occasionally offers courses) or online (for example, ehaccp.org).

Facility Requirements

To be approved for meat processing, facilities must meet specific structural, sanitary, and operational standards. This includes proper refrigeration, equipment, pest control, and sanitation plans.¹¹ Producing meat-containing products in a shared-use facility (shared commercial kitchen)¹² may be possible, but presents additional challenges, such as scheduling, cross-contamination risks, and consistently meeting all inspection requirements. Generally, the manufacturer will need to demonstrate that their product can be separated by time or space from other products produced in the facility. Not all shared kitchens are (or can be) licensed for meat processing.

.....

This document provides the most current information at the time of its publication, and is intended to provide guidance only. Readers should contact AURI or another regulatory professional for the latest information when finalizing any product label details.

References

1. www.mda.state.mn.us/food-feed/starting-meat-poultry-processing-business
2. www.fsis.usda.gov/sites/default/files/media_file/2021-02/Fed-Food-Inspect-Requirements.pdf
3. www.mda.state.mn.us/food-feed/wholesale-food-processormanufacturer-license
4. www2.minneapolismn.gov/business-services/licenses-permits-inspections/business-licenses/food-restaurants/grocery-convenience-store/micro-food-wholesaler/
5. www.fsis.usda.gov/inspection/state-inspection-programs
6. www.mda.state.mn.us/food-feed/starting-meat-poultry-processing-business
7. www.fda.gov/food/guidance-regulation-food-and-dietary-supplements/hazard-analysis-critical-control-point-haccp
8. www.fsis.usda.gov/guidelines/2021-0014
9. www.fsis.usda.gov/guidelines/2021-0013
10. [HACCP Guidance | Food Safety and Inspection Service](#)
11. www.mda.state.mn.us/sites/default/files/docs/2025-04/E2_Meat_Manual_4-2-25-WEB.pdf
12. www.mda.state.mn.us/sites/default/files/docs/2023-07/Shared-Kitchens-7.19.23.pdf

.....

