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FDA FOOD LABEL

REQUIREMENTS IN A NUTHSELL

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FDA FOOD LABEL REQUIREMENTS IN A NUTSHELL

There are at least two reasons you, as a food manufacturer, want to comply with regulations that the Food and Drug Administration prescribes for all labels for food made, imported and distributed in the US. These reasons are:

1) You certainly want potential customers to be informed as accurately as possible about your product.

2) Unless you **comply with FDA regulations** concerning required information on food packaging labels, your company may be subject to sanctions and penalties, while your food product may be removed from the market.

It is the sole responsibility of food producers to follow FDA guidelines carefully and give accurate specifications for food label design to their label manufacturer. Since the process of labeling food is very complex, here we will give you an outline of what it entails, with additional resources where you can further inform yourself about food labeling.

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5 BASIC ELEMENTS OF A FOOD PACKAGING LABEL

When you look at pages and pages of information on the fda.gov website about how to properly label your food product, it is at first difficult to decipher what type of this information is absolutely mandatory. On closer inspection you'll find that the following five items must appear on every food packaging sticker:

- **Statement of identity**
- **Manufacturer, packer or distributor's name and address**
- **Net quantity of food packaging**
- **Nutrition facts**
- **Ingredient list**

Note that the statement of identity means common name for that food product, NOT the brand's name. Examples are: tomato soup, turkey smoked sausage, granola bars, chocolate chip cookies, etc. The manufacturer, packer or distributor's address should contain the street address in case it is not listed, city or town, US state or country and ZIP or mailing code.

PLACEMENT OF FOOD LABEL ELEMENTS

Principal Display Panel or PDP is the front part of the food packaging or the "facing side" that is the most visible to consumers. This is where the statement of identity and net quantity are required to appear. The net weight information must appear in the lower 30% part of the PDP. Nutrition facts, ingredient list and manufacturer's information can either be placed on the PDP, if there is enough space, or on the Information Panel – the panel right next to and to the right of the PDP.

Aside from this mandatory information, product providers are free to use the remaining space on the label to provide additional information that may be of interest to their customers.

Of course, there are many cases where it is impossible to place information as instructed here, due to small size of the packaging. In those situations the FDA allows information to be featured on any label panel that is visible to the customer. Packages with insufficient vertical space can have label information laid out horizontally.

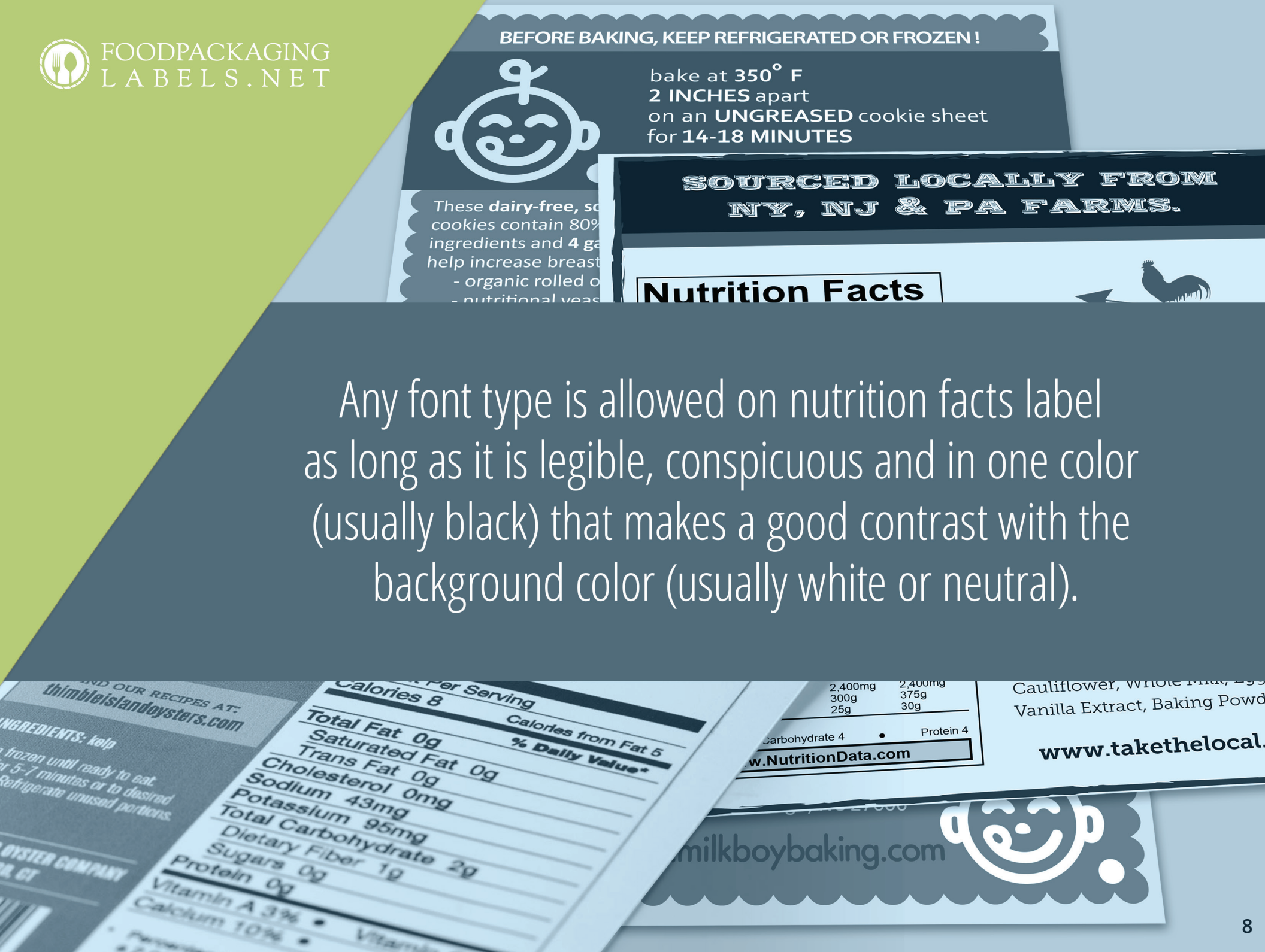
Here is FDA's detailed guide to what goes where on a food label.

TYPE REQUIREMENTS

The statement of identity should be in bold type, prominent and at least half the size of the largest type on the food label.

The Food and Drug Administration urges food manufacturers to use 6 point or larger Helvetica Black and Helvetica Regular types for nutrition facts label, but that is not mandatory. Any type is allowed as long as it is legible and conspicuous, the contrast between the lettering is clear and the letters are more than three times as high as they are wide. Also, the heading “Nutrition Facts” needs to be larger than all other information on that panel and set full width.

All nutrition information must be one color type, usually black, and its background should be white or neutral. The contrast between type and background colors should be sharp. In some cases the reverse is possible, but permission should be granted by the FDA.



Any font type is allowed on nutrition facts label as long as it is legible, conspicuous and in one color (usually black) that makes a good contrast with the background color (usually white or neutral).

INGREDIENT LIST

All ingredients in a food packaging, including water, spices and flavors, must be listed on the label in the order of predominance by weight (from the ingredient that weighs the most to the ingredient that weighs the least). This information can be placed on the PDP or on the Information Panel, in type size that is at least 1/16 inches in height.

Always use common names of ingredients, unless there is a regulation that dictates different terms for specific ingredients.

For all food products regulated by the FDA and packaged in or after January 2006, labels must inform about the common food allergens. These are: **Milk, Eggs, Tree nuts, Peanuts, Wheat, Fish, Crustacean shellfish, Soybeans.**

It is also mandatory to specify the type of tree nut, fish and Crustacean shellfish present in the food. The allergens can either be listed on the ingredient list, or after the list with the word "Contains" before the listed allergens. Food manufacturers can apply for an exemption from these allergen labeling requirements. For more information about specific allergen labeling requirements, see this page. Also see the complete ingredients list requirements information.

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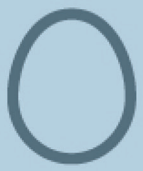
Milk



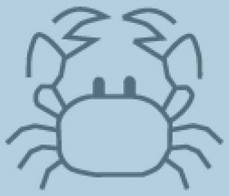
Eggs

Fish

Peanuts

All food labels must inform consumers about the common food allergens. These are: Milk, Eggs, Fish, Peanuts, Wheat, Tree nuts, Crustacean shellfish, Soybeans.

Soybeans



Crustacean Shellfish

Wheat

Tree Nuts

NUTRITION FACTS

Nutrition facts information consists of three parts:

1) Serving size and calories
2) Nutrients and daily values (DV)
3) Vitamins and minerals and DV

In 2016 the FDA published new rules for Nutrition Facts labeling for packaged food. Food producers have until 2020 and 2021 (depending on the amount of their annual sales) to redesign their labels and comply with FDA requirements.

The displayed photo above shows the new nutrition facts label side by side.

Nutrition information must be separated using hairlines, as shown in these images. The width of the bars separating categories of information on the nutrition facts label is optional.

SERVING SIZE

All nutrition facts are based on the serving size of a food product as prescribed by the FDA. "Serving size" is a customary amount of food a person older than four years consumes during one meal. There are also specifications for infants and children 1-3 years of age.

It is the food manufacturer's obligation to closely follow FDA regulations to determine the correct serving size for their product. The FDA lists 139 food product categories and values for each type of food that represent the Reference Amount Customarily Consumed (RACC). RACC is used to determine the serving size that should be displayed on the label, both in household and metric measures.

The difference between single serving and multi-serving packaging is in that multi-serving food packaging labels need to display the serving size household and metric measurement, while the single serving uses a description of the container instead of measurements. For example: **1 cup, 1 container, 1 package**.

To accurately determine the serving size of your product, follow this link. Food manufacturers who don't see their product in any category can petition the FDA to establish RACC for their product.

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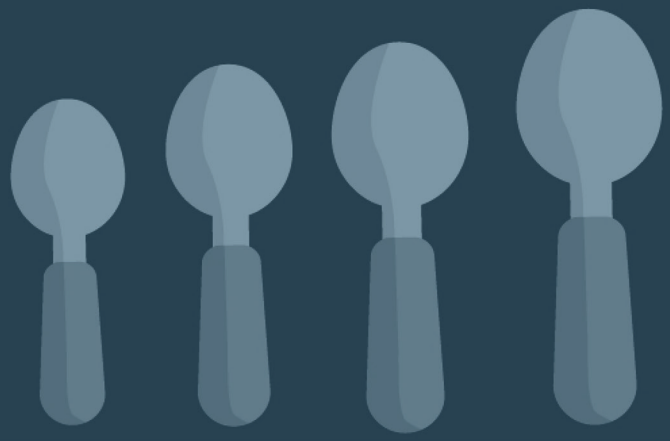
Serving size is a customary amount of food
a person older than 4 years consumes during a meal.
There are also specs for children 0-3 years old.



The difference between the old and the updated nutrition facts label regarding serving size is in the placement and prominence of the term. The amount of servings is more prominent, and the term "serving size" is bolded. The information about calories is also larger on the new label.

NUTRIENTS

There are five core nutrients, plus calories, that must appear on all nutrition fact labels regardless of the amounts present in food:

- Calories
- Total Fat
- Cholesterol
- Sodium
- Total Carbohydrates
- Protein

If other nutrients are present at 0 grams per serving, they can be labeled with: “Not a significant source of ____”. They are to be listed in the order they usually appear on nutrition facts label:

- Saturated fat
- Trans fat
- Dietary fiber
- Total sugars

The updated label from 2016 includes additional information about added sugars, which appears directly under the information about sugars - which is now phrased as Total Sugars.

NUTRIENTS (CONTINUED)

This added information should appear above information on vitamins and minerals, printed in 6 point type.

Vitamins and minerals that are required to appear on the label are: Vitamin D, potassium, calcium and iron. Other vitamins and minerals are optional.

Daily Values is another required element of a nutrition facts label and usually appears next to the vitamins and minerals information, on the right.

There are some food products which can be exempted from nutrition labeling, such as:
Coffee beans, Tea leaves, Unsweetened instant coffee and tea, Condiment-type dehydrated vegetables, Flavor extracts, Food colors, Some raw fruits and vegetables (unprocessed, untreated, with no added ingredients)

Detailed information about creating nutrition fact labels can be found here.

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There are five core nutrients that must always appear on all nutrition fact labels: total fat, cholesterol, sodium, total carbs, protein.

And now, saved for last, there is some good news! Not all small businesses need to include a nutrition facts label on their food product. Food and Drug Administration offers guidance for small businesses that are exempt from nutrition labeling, including a detailed explanation on how to file for exemption.

CONCLUSION

Food Label Requirements in a Nutshell serves to provide information about the complex food labeling process in a simplified way, and guide food producers through some basic food labeling steps for informational purposes. This document should in no way be taken as a practical tutorial on how to label your food product.

For specific FDA regulations on how to design labels for food packaging, start by consulting the following Food Labeling Guide by the U.S. Food and Drug Administration.

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Interesting facts:
20 most frequently consumed

RAW FRUITS IN THE US

apple, avocado (California), banana, cantaloupe, grapefruit, grapes, honeydew melon, kiwifruit, lemon, lime, nectarine, orange, peach, pear, pineapple, plums, strawberries, sweet cherries, tangerine, and watermelon

RAW VEGETABLES IN THE US

asparagus, bell pepper, broccoli, carrot, cauliflower, celery, cucumber, green (snap) beans, green cabbage, green onion, iceberg lettuce, leaf lettuce, mushrooms, onion, potato, radishes, summer squash, sweet corn, sweet potato, and tomato

RAW FISH IN THE US

blue crab, catfish, clams, cod, flounder/sole, haddock, halibut, lobster, ocean perch, orange roughy, oysters, pollock, rainbow trout, rockfish, salmon (Atlantic/coho/Chinook/sockeye, chum/pink), scallops, shrimp, swordfish, tilapia, and tuna

SOURCES:

http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocuments-RegulatoryInformation/LabelingNutrition/ucm2006828.htm

https://www.fda.gov/Food/IngredientsPackagingLabeling/FoodAdditivesIngredients/ucm094211.htm

https://www.fda.gov/downloads/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/UCM265446.pdf

http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocuments-RegulatoryInformation/Allergens/ucm106890.htm#label

https://www.govinfo.gov/content/pkg/CFR-2008-title21-vol2/xml/CFR-2008-title21-vol2-part101.xml

http://www.fda.gov/Food/ComplianceEnforcement/default.htm

http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/cfrsearch.cfm?fr=101.12

https://www.fda.gov/regulatory-information/search-fda-guidance-documents/small-business-nutrition-labeling-exemption-guidance

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FIND OUT MORE ABOUT LABELING FOOD PRODUCTS AT:

https://www.foodpackaginglabels.net/