



### Food Labeling 101:

Understanding the Nutrition Facts Label

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Most packaged food items sold in the United States are regulated by the FDA and must display a product label, the rules for which can be long and complicated.

Regulations cover the Nutrition Facts, food names, quantity, allergens, claims, and other elements.

With more than 35 years of experience in the nutrition analysis and food labeling industry, we at Trustwell are well versed in the FDA food labeling and packaging regulations. We present here the basic requirements in this easy-to-grasp guide.

However, keep in mind that specific regulations may vary based on the type of food product and any specific labeling exemptions or requirements that apply to that product category. It's crucial to consult the most recent version of the FDA's regulations or seek legal advice to ensure compliance with the latest requirements.



FDA-regulated food packages must contain the following components:

- 1) Statement of identity, or name of the food
- Net quantity of contents, or amount of product
- 3 Nutrition Facts Panel
- 4 Ingredient Statement and Allergen Declaration
- Name and address of the manufacturer, packer, or distributor
- In some instances, warning and safe handling statements

The regulations dictate each component's placement, type size requirements, and more.



### **Areas Defined**

Before diving into each component of the FDA's regulations, let's take a moment to explore two essential areas on product packaging designated for crucial labeling elements: the Principal Display Panel (PDP) and the Information Panel (IP). Understanding these key sections and the placement of labeling elements is important. These areas form the backbone of how food products convey important information to consumers, ensuring transparency and facilitating informed choices.



### Principal Display Panel (PDP)

Food item packaging is designed with at least one (often more than one) area most likely to be seen by a buyer at the time of purchase. This is called the Principal Display Panel (PDP). When another area or side of the package is suitable for display, this is called an alternate PDP. The PDP should be large enough to easily accommodate the needed mandatory label information.

For a rectangular container like a cereal box, the PDP area is the product of the height times the width. For a cylindrical container like a can, the PDP area is 40 percent of the area available for labeling.

### Information Panel (IP)

The information panel is the panel or area immediately to the right of the PDP, as displayed to the consumer.



### **Placement**

At this point, you have some options: you can display all of the required information on the PDP and alternate PDPs or you can divide the information between the PDPs and the Information Panel:

## This information is required to be placed on the PDP (or alternate PDPs):

- 1 The statement of identity or name of the food
- 2 The net quantity statement





NOTE: The Nutrition Facts label, Ingredient Statement, Allergen Declaration, and name/address information must appear together without any intervening materials.

STATEMENT OF IDENTITY: "Cereal Flakes"



# Statement of Identity

LOCATION: PDP

REQUIRED INFORMATION: Legal name of the food

The Statement of Identity is the legal name of the food (example: Nilla Wafers), the common name of the food (example: peanut butter), or, when the other two are not appropriate, a description of the food (example: whole green peas).

NOTE: The Statement of Identity is not to be confused with the brand. Example: "Cereal Flakes" is the Statement of Identity, "Kellogg's" would be the brand.

This must be placed on the PDP as one of the primary art elements. The type height should be, at a minimum, half the size of the largest font on the package.







# **Net Quantity of Contents**

**LOCATION: Bottom third of the PDP** 

**REQUIRED INFORMATION: Amount of food in package** 

This is the amount of food in the package. It should be displayed as a weight, fluid measure, or number of items. This is placed in the bottom 30 percent of the PDP in a type height determined by total PDP area.

TYPE HEIGHT	TOTAL PDP AREA
1/16 in. (1.6 mm)	5 sq. in. (32 sq. cm.) or less
1/8 in. (3.2 mm)	More than 5 sq. in. (32 sq. cm.) but not more than 25 sq. in. (161 sq. cm.)
3/16 in. (4.8 mm)	More than 25 sq. in. (161 sq. cm.) but not more than 100 sq. in. (645 sq. cm.)
1/4 in. (6.4 mm)	More than 100 sq. in. (645 sq. cm.) but not more than 400 sq. in. (2580 sq. cm.)
1/2 in. (12.7 mm)	Over 400 sq. in. (2580 sq. cm.)



# Ingredient Statement

#### LOCATION:

Information Panel

#### REQUIRED INFORMATION:

Ingredients by weight in descending order of predominance



- » The ingredient statement must be listed on the same panel as the manufacturer information and is also required to be on the same panel as the Nutrition Facts panel, and it should be located immediately below or adjacent to the Nutrition Facts panel.
- » The ingredients must be listed by weight in descending order of predominance, and by their common or usual name (example: "sugar" instead of "sucrose").
- The format regulations state that you have to use a type that is at least 1/16" tall and easy to read.



# **Allergen Declaration**

The Food Allergen Labeling and Consumer Protection Act of 2004 mandates that packaged food items declare, in plain language, the presence of any major food allergens. This list, historically referred to as the "Big 8" Allergens, was expanded on April 23, 2021, when the FASTER Act was signed into law, declaring sesame as the 9th allergen. The law defines a major food allergen to mean any one of the following foods or food groups (or an ingredient that contains their proteins):













Shellfish\*













Sesame

### **EXAMPLE 1:**

### Declared within the Ingredient Statement

» Peanut butter (peanuts), casein (milk), spices (sesame)...

#### **EXAMPLE 2:**

### Declared in the Contains Statement

» CONTAINS: peanuts, milk, and sesame

<sup>\*</sup>Must identify the species for fish, crustacean shellfish, and tree nuts (e.g., for "tree nuts" you must indicate if it's pecans, almonds, walnuts, etc.) The allergen may either appear in parentheses after the name of the ingredient in the ingredients list OR immediately after the list (or adjacent to) in a "contains" statement.

# **Contact Information**

LOCATION: Most often on the Information Panel

REQUIRED INFORMATION:

Name and address of the manufacturer, packer or distributor

The food package must show the following:

- » Name and address of the manufacturer, packer or distributor.
  Unless the name given is the actual manufacturer, it must be accompanied by a qualifying phrase that states the firm's relation to the product, e.g., "manufactured for" or "distributed by"
- » Street address
- » City or town
- » State (or country, if outside the United States)
- » ZIP code (or mailing code used in countries other than the United States)



Most often, this is listed on the Information Panel.
The placement of the manufacturer's information
determines the placement of the Ingredients List as
the contact information must follow the ingredient
list on the information panel if space allows.

CONTACT INFORMATION "Manufactured by..."



### **Nutrition Facts Panel**



LOCATION: On the PDP or the Information Panel, alongside or near the ingredient statement

REQUIRED INFORMATION: Serving size, servings per container, and nutrients

The Nutrition Facts label is rigorously regulated, which is why this ebook devotes an entire section to it.

In general, the Nutrition Facts label is placed on the Information Panel, alongside or near the ingredient statement and the manufacturer's information. Depending on the size of the package, you have a variety of format options for the Nutrition Facts.



NUTRITION FACTS:
"...15 servings per..."

### **Panel format options:**

- 1 Tabular Full
- 2 Standard Full
- 3 Dual Column for multiple serving sizes
- 4 Linear Full

Standard Full: This is the most common label format. If space is available (> 40 sq. inches) you should use this format. In some cases, however, there is not enough continuous vertical space to do so. In that case, you may use the "side-by-side" format.

8 servings per container  Serving size 2/3 cu	ıp (55g
Jerving Size 2/3 CC	p (339
Amount per serving	230
Calories	230
% I	Dally Value
Total Fat 8g	10%
Saturated Fat 1g	5%
Trans Fat 0g	
Cholesterol 0mg	0%
Sodium 160mg	7%
Total Carbohydrate 37g	13%
Dietary Fiber 4g	149
Total Sugars 12g	
Includes 10g Added Sugars	20%
Protein 3g	
Vitamin D 2mcq	109
Calcium 260mg	209
Iron 8mg	459
Potassium 240mg	69

2 Tabular Full: If the package does not have enough continuous vertical space or the total available space is less than 40 sq. inches, you may use the tabular (horizontal) format.

Nutrition	Amount/sorving	% Daily Value*	Amount/serving % Da	ily Value*	
	Total Fat 1.5g	2%	Total Carbohydrate 36g	13%	"The % Daily \ (DV) tells you
Facts	Saturated Fat 0.5g	3%	Dietary Fiber 2g	7%	much a nutrier in a serving of
10 servings per container	Trans Fat 0.5g		Total Sugars 1g		food contribute a daily diet, 2,
Serving size	Cholesterol Omg	0%	Includes 1g Added Sugars	2%	calories a day
2 slices (56g)	Sodium 280mg	12%	Protein 4g		used for gene nutrition advice

3 **Dual Column for multiple serving sizes:** 

> A dual column is required when a package contains 200-300 percent of the RACC serving size. It's used when there's a possibility of someone consuming the whole container, such as a pint of ice cream. The dual column label will show nutrition facts for one serving as well as for the entire package.

2 servings per container Serving size 1 cup (255g)						
	Per	serving	Per c	ontaine		
Calories	220		440			
Total Fat	5g	6%	10g	13%		
Saturated Fat	2g	10%	4g	20%		
Trans Fat	0g		0g			
Cholesterol	15mg	5%	30mg	10%		
Sodium	240mg	10%	480mg	21%		
Total Carb.	35g	13%	70g	25%		
Dietary Fiber	6g	21%	12g	43%		
Total Sugars	7g		14g			
Incl. Added Sugars	4g	8%	8g	16%		
Protein	9g		18g			
Vitamin D	5mcg	25%	10mcg	50%		
Calcium	200mg	15%	400mg	30%		
Iron	1mg	6%	2mg	10%		
Potassium	470mg	10%	940mg	20%		

**Linear Full:** If the available labeling space is 40 square inches or less, and the shape cannot accommodate the horizontal, "side-by-side" or tabular formats, you may use the linear format. The formatting differs a fair amount from the other labels.

> Nutrition Facts Servings: 12, Serv. size: 1 mint (2g), Amount per serving: **Calories 5, Total Fat** 0g (0% DV), Sat. Fat 0g (0% DV), *Trans* Fat 0g, **Cholest.** Omg (0% DV), **Sodium** Omg (0% DV), **Total Carb.** 2g (1% DV), Fiber 0g (0% DV), Total Sugars 2g (Incl. 2g Added Sugars, 4% DV), **Protein** 0g, Vit. D (0% DV), Calcium (0% DV), Iron (0% DV), Potas. (6% DV).





### **Nutrition Facts Panel cont.**

### Additional format options for small packages

In certain scenarios, smaller packages have the option to use abbreviations and utilize a simplified label in order to save space while providing essential information about the nutrient content of the food product.

### **Simplified Format**

The Simplified Label format can be used when a food product contains an insignificant amount of eight or more of the following nutrients: Calories, total fat, saturated fat, trans fat, cholesterol, sodium, total carbohydrate, dietary fiber, total sugars, added sugars, protein, vitamin D, calcium, iron, and potassium.

#### **Abbreviations**

Abbreviations serve to conserve space; below are a few examples of approved abbreviations:

- » Serving size Serv size
- » Servings per container Servings
- » Calories from saturated fat Sat fat cal.
- » Saturated fat Sat fat
- » Vitamin Vit.

In addition, packages with a total surface area of less than 12 square inches (about the size of a pack of chewing gum) do not have to carry nutrition information unless a nutrient content or health claim is made for the product on the label or in any advertising.



NOTE FROM THE CFR:



### **Nutrition Facts Panel cont.**

In certain scenarios, smaller packages have the option to use abbreviations and utilize a simplified label in order to save space while providing essential information about the nutrient content of the food product.



### 1 - Servings Per Container

This is the number of servings of the food item (based on the serving size) that the package contains.

#### **Nutrition Facts** 10 servings per container 3/4 cup (100g) Serving size 120 Calories ily Value Total Fat 9g 12% Saturated Fat 1.5g Trans Fat 0g Polyunsaturated Fat 1g Monounsaturated Fat 6g Cholesterol 0mg Sodium 220mg 10% Total Carbohydrate 9g 3% Dietary Fiber 1g 4% Total Sugars 1g Includes 0g Added Sugars 0% Protein 2g Vitamin D 0mcq 0% Calcium 28mg 2% Iron 1mg 6% Potassium 190mg 4% Vitamin A 15mcg 2% Vitamin C 10mg 10% Vitamin E 1mg 6% Vitamin K 27mcg 25% 8% Thiamin 0.1mg Riboflavin 0.1mg 8% Niacin 1ma 6% Vitamin B<sub>6</sub> 0.1mg 6% Magnesium 29mg 6% 10% Zinc 1ma Selenium 2mcg 4% Copper 0.1mg 10% Chloride 16mg 0% Choline 10mg

### 2 - Serving Size

To establish the serving size for your product per FDA regulations, it's important to refer to the agency's Reference Amounts Customarily Consumed Per Eating Occasion (RACC) table. The serving size declared on your label should be based on the RACC and must be expressed in a common household measure or common household unit along with the metric equivalent.

#### **EXAMPLES:**

1 piece (50g) | 12 fl oz (360mL) | 1 cup (240mL)

### 3 – Mandatory Nutrients

The mandatory components and the order in which they must appear on the Nutrition Facts label are:

- » calories
- » total fat
- » saturated fat
- » trans fat
- » cholesterol
- » sodium
- » total carbohydrate
- » dietary fiber

- » total sugars
- » added sugars
- » protein
- » vitamin D
- » calcium
- » iron
- » potassium

### 4 - Voluntary Nutrients

Manufacturers can voluntarily list additional vitamins and minerals, such as Vitamin A, Vitamin C, Zinc, and Copper, on the nutrition label. If these nutrients are added to the food, or if a packaging claims is made, related nutrients must be declared.



**NUTRIENT CONTENT CLAIM:** "LOW FAT"

### **Nutrient Content Claims**

A Nutrient Content Claim is a statement indicating the level of a nutrient in a food product, such as "low fat," "high fiber," or "sugar-free." The FDA has defined specific criteria for allowable claims, ensuring accuracy and consistency.

Claims can be displayed on the PDP, Information Panel or anywhere else on the package, but should not be placed in between the required components on the information panel (as it would be considered intervening material). Additionally, the font used for the claim can't be more than twice the size as the font used for the Statement of Identity.

IMPORTANT NOTE: If you choose to use a Nutrient Content Claim on your package, you must have a Nutrition Facts label showing that nutrient and its value. It's also important to note that the use of Nutrient Content Claims may also trigger additional disclosure statements.



## **Additional Information**

#### **Barcode**

No government regulatory agency requires that your food package have a barcode. Most retail establishments, however, will. The barcode must be placed in a manner where it doesn't interfere with the required labeling elements.

### Best before, expiration, or sell-by date

While the FDA does not mandate Best Before, Expiration, or Sell-By dates, it is recommended to include them. Regarding their placement on the package, certain guidelines should be followed:

- » The date cannot interfere with required labeling elements
- » It must show month, day, and year immediately adjacent to an explanatory phrase ("best before," "sell by," etc.)

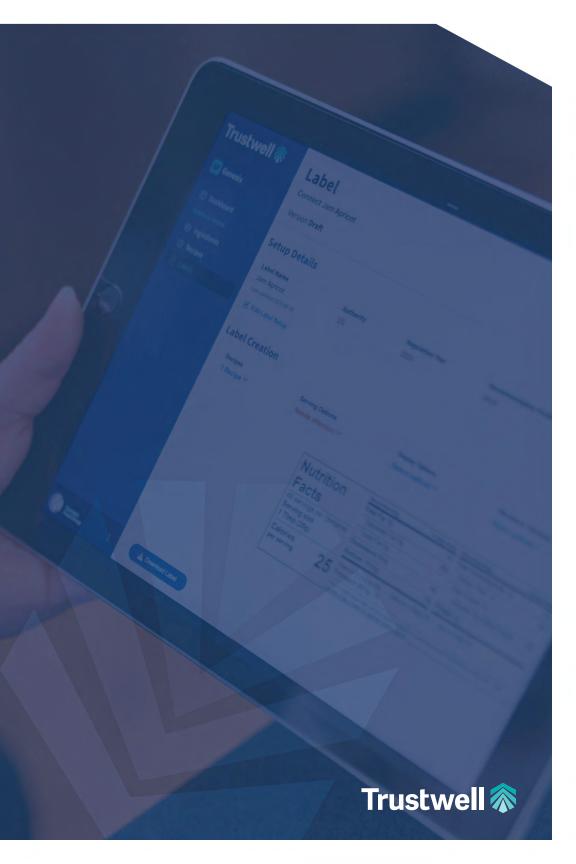
### Warning and Safe Handling Statements

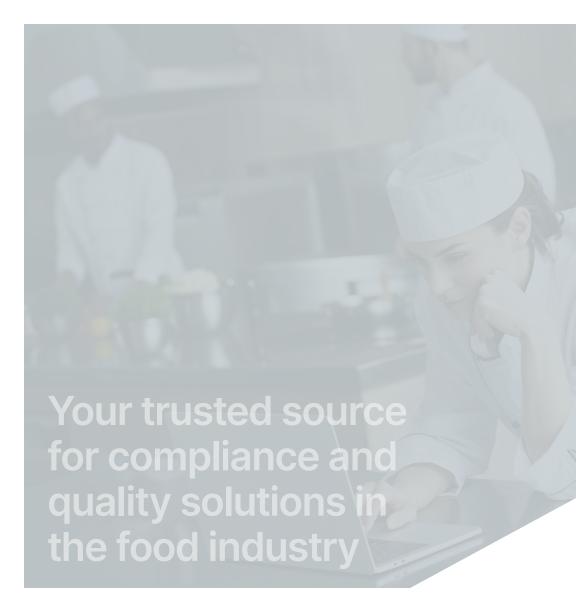
Some packages require warnings and safe-handling statements. These include:

- » Self-pressurized containers
- » Food containing or manufactured with a chlorofluorocarbon or other ozonedepleting substance
- » Products with greater than 1/2 the calories from protein
- » Protein products labeled as weight-loss products
- » Unpasteurized juices
- » Foods containing psyllium husk
- » Shell eggs

For further information please refer to the Code of Federal Regulations at **ecfr.gov**.









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