

LABELING REQUIREMENTS FOR PACKAGED FOODS

Food product packaging has multiple functions:

1. It attracts a consumer's attention
2. It protects the product inside
3. It is used to convey important FDA or USDA regulated information to the consumer

To ensure that this regulated information is easily understood by the intended audience (the shopper/consumer), the FDA/USDA requires specific locations and formatting (including font sizes) of the information on a package. This is outlined in the FDA Food Labeling Guide. [1]

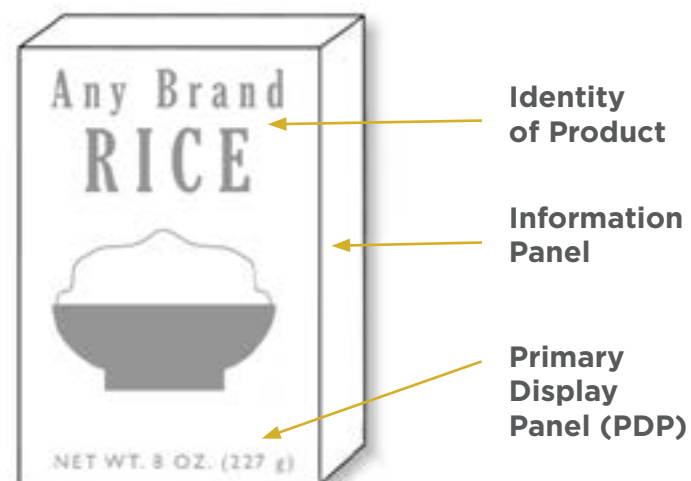
PACKAGE LABEL REQUIREMENTS

Required information is located on the Primary Display Panel (PDP), or the side of the package that will face the consumer on the shelf, and the Information Panel (see Figure 1). There are five essential pieces of information that must be displayed on the PDP and the Information Panel for any packaged food product:

Identity or name of the food:

A truthful product name is required and must use a relatively large and bold type, that is reasonably center of the label.

Figure 1. Location of primary elements on a food package.



Net quantity of contents:

The minimum amount of food contained in the product, not including the packaging materials. Net Weight (NET WT) for solids or semi-solid foods or Net Volume (NET VOL) for liquids.

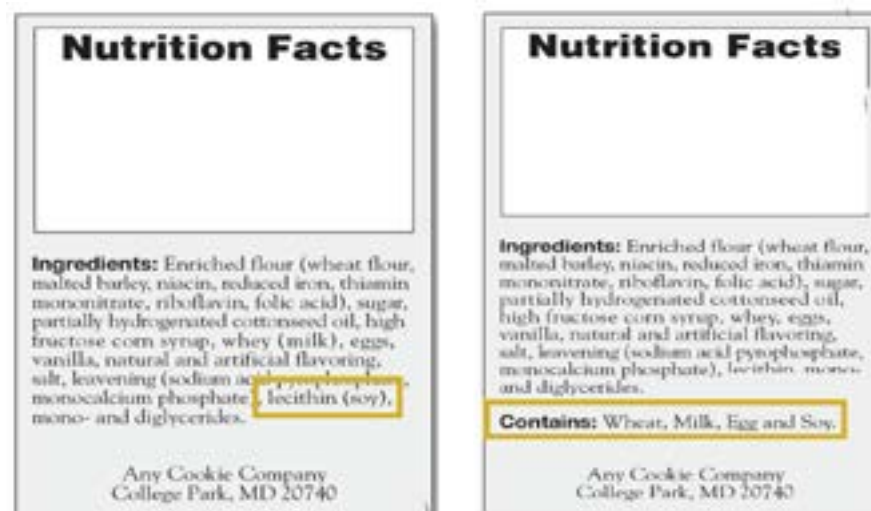
Figure 2. Location of food product net quantity on a primary display panel.



Ingredient and Allergen Lists:

Ingredients must be listed as the common or usual name most associated to it by consumers, in descending order by weight. Should an ingredient itself be made of other ingredients, sub-ingredients will be listed in parentheses after it, i.e. Coffee Creamer (Skim Milk, Cream, Sugar, Natural Flavors).

Allergen labeling on packaged foods is required per the Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA).^{2,3} Listing allergens can be done according to one of the two options shown in Figure 3.



OPTION 1

OPTION 2

Figure 3. Allergen labeling options.

Note that Option #2 is the industry standard for message clarity to the consumer, and the approach AURI STRONGLY recommends.

NUTRITION FACTS

With some exceptions, a Nutrition Facts Panel is required. This will include the serving size, calories, and other key nutrients of the food (see Figure 4).

Figure 4. Example FDA-compliant Nutrition Facts Panel.⁵ The FDA updated the label design in 2020 after over 20 years to make it easier for consumers to make informed food choices that contribute to healthy eating habits.⁶

While most packaged foods are required to include a nutrition facts panel, there exist circumstances that could exempt a business from this requirement:

“One exemption, for low-volume products, applies if the person claiming the exemption employs fewer than an average of 100 full-time equivalent employees and fewer than 100,000 units of that product are sold in the United States in a 12-month period. To qualify for this exemption the person must file a notice annually with FDA. Note that low volume products that bear nutrition claims do not qualify for an exemption of this type.”⁴

Note that while a business may be exempt from the federal on-pack nutrition labeling requirement, a retailer is within their rights to require on-pack nutrition labels in their stores.

Nutrition Facts	
8 servings per container	
Serving size 2/3 cup (55g)	
Amount per serving	
Calories 230	
% Daily 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	14%
Total Sugars 12g	
Includes 10g Added Sugars	20%
Protein 3g	
Vitamin D 2mcg	10%
Calcium 260mg	20%
Iron 8mg	45%
Potassium 240mg	6%

* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

For more information, click [here](#).

If you need expert help creating a packaged food label, [contact the AURI food team](#) to open a project.

REFERENCES:

1. <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-food-labeling-guide>
2. <https://www.fda.gov/food/food-allergens-and-gluten-free-guidance-documents-and-regulatory-information/food-allergen-labeling-and-consumer-protection-act-2004-falcpa>
3. <https://www.fda.gov/food/labeling-nutrition-guidance-documents-regulatory-information/small-business-nutrition-labeling-exemption>
4. <https://www.fda.gov/food/nutrition-education-resources-materials/new-nutrition-facts-label>
5. <https://www.fda.gov/media/135197/download>