

Product Label Information Guide

MANDATORY FOOD LABELING REQUIREMENTS

Panels- Most food labels should have at least 2 panels:

- **Principle Display Panel** (PDP) – the panel facing the customer at the time of purchase. This panel must contain, at a minimum, the Statement of Identity and Net Weight Statement.
- **Information Panel** (IP) – located to the right of the PDP. Usually contains the nutritional label, ingredient statement and name of the responsible company (manufacturer, packer, distributor).

Five Mandatory Parts of a Label

1. **Statement of Identity**

- a) Use standardized name, common or usual name or fanciful name in priority order.
- b) Must be a descriptive term or phrase that is not false or misleading and that tells the consumer what they are purchasing.
- c) Must be one of the principle features on the PDP.
- d) Must be in bold type.
- e) Should be at least one half the type size of the largest printed matter on the PDP.
- f) Terms such as “Imitation” and “Substitute” have specific meaning so must be used appropriately. Imitation means the product is nutritional inferior to the product it is patterned after. Substitute foods are nutritionally equivalent but can be used in place of another product.

2. **Net Weight Statement**

- a) Must be in the U.S. customary inch-pound system (oz, fl oz, gal, lbs, etc) and also in the metric system (grams, liters, etc).
- b) Should be the net weight excluding packaging material.
- c) Must be prominent and in bold type.
- d) Must be in proportion to the area of the PDP. If PDP is < 5 sq in use 1/16” type; if PDP is 5 sq in to 25 sq in use 1/8” type; if PDP is 25 sq in to 100 sq in use 3/16” type.
- e) Should be in bottom 30% of the PDP and on a line parallel to bottom of the PDP.

3. **Nutritional Label**

There are numerous parts but the authorities are going to key in on the following:

- a) Serving size – this should be standardized across all similar products (e.g. all ketchups are 1 tablespoon). Serving size should be in both household measurement and metric.
- b) Trans fat is required on all labels.
- c) If samples are taken for analysis, regulators will key in on total fat and sodium amounts.

4. Ingredient Statement

- a) List of ingredients in descending order of prominence by weight. It is acceptable at the end of this list to have the phrase (“Contains 2% or less of”).
- b) Following passage of the Food Allergen Labeling Act in 2004, all products must identify on their ingredient statement if they contain the proteins of one of the 8 major allergens - wheat, peanuts, eggs, tree nuts, fish, crustacean (shellfish), soy, or milk - OR must include at the end of the ingredient list a statement “Contains milk, wheat etc”.
- c) An ingredient list is not necessary if there is a single ingredient (e.g. carrots).
- d) All oils must be listed and their sources identified - e.g. cottonseed oil, hydrogenated cottonseed oil, partially hydrogenated oil. This is especially important since hydrogenated translates to trans fat, a concern for many consumers.
- e) If using an ingredient made up of several other ingredients/components (for example, ketchup), list the multi-component ingredient followed by a parenthetical listing of its ingredients OR incorporate each ingredient of the multi-component ingredient into the overall ingredient statement without declaring the multi-component ingredient.

5. Responsible Company

Name and place of business of manufacturer, packer or distributor. If this company is listed in the telephone directory, only need company name, city, state and zip code. If the business is not in their local telephone directory, must include the street address.

Other Information About Food Labeling

- A) If any information in the 5 mandatory parts is in a foreign language, all 5 parts must be in both English and that foreign language.
- B) If there is a problem with the information presented on a label, the FDA generally will not force a recall unless the problem poses a serious health risk. Such problems occur mainly from the use of illegal ingredients or inadequate allergen labeling. It is up to the states to regulate all other parts of a food label. Despite the fact that state regulations are based on FDA regulations, the interpretation of these regulations can be highly variable from state to state.
- C) Country of Origin must be declared in the information panel if ingredients are from outside the U.S.A. For example: “Product of Spain.” Do not use abbreviations for country names. Type size for this statement should be same size as that used for the name and address of the manufacturer (responsible company).
- D) If the food product contains 2% or more meat or poultry, the PDP must also contain the USDA Inspection logo with the establishment number.
- E) FDA has set standards for the meaning of label terms used to make nutritional or health claims – for example: light, lean, sodium free. If these claims are used, the product must meet these standards.

The FDA has prepared a guide for preparing food labels. This guide can be found at:

<http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm2006828.htm>