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, and other elements.

With more than 30 years of experience in the food industry, we at ESHA Research are well versed in the FDA Food Labeling Guide and are presenting here the basic requirements into this simplified guide.
FDA-regulated food packages must contain these 5-6 components:

- Statement of identity, or name of the food.
- Net quantity of contents, or amount of product.
- Nutrition Facts.
- Ingredient & Allergen Statement.
- 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

**PDP**
*(Principal Display Panel)*

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 clearly 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 product of the height times the circumference.

**Information Panel**

The information panel is the panel or area (if, say, the package is a can) immediately to the right of the PDP, as displayed to the consumer.
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:

**Placed on the PDP (and alternate PDPs):**
- The statement of identity
- The net quantity statement

**Placed on the PDP or Information Panel:**
- Nutrition Facts or Supplement Facts
- Ingredient & Allergen Statement
- Name and address of manufacturer, packer, or distributor
- Food warning and safe handling statements
Statement of Identity

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: “Corn 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**

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.

### Location:
Bottom third of PDP

### Required information:
Amount of food in package

<table>
<thead>
<tr>
<th>TYPE HEIGHT</th>
<th>TOTAL PDP AREA</th>
</tr>
</thead>
<tbody>
<tr>
<td>1/16 in. (1.6 mm)</td>
<td>5 sq. in. (32 sq. cm.) or less</td>
</tr>
<tr>
<td>1/8 in. (3.2 mm)</td>
<td>More than 5 sq. in. (32 sq. cm.) but not more than 25 sq. in. (161 sq. cm.)</td>
</tr>
<tr>
<td>3/16 in. (4.8 mm)</td>
<td>More than 25 sq. in. (161 sq. cm.) but not more than 100 sq. in. (645 sq. cm.)</td>
</tr>
<tr>
<td>1/4 in. (6.4 mm)</td>
<td>More than 100 sq. in. (645 sq. cm.) but not more than 400 sq. in. (2580 sq. cm.)</td>
</tr>
<tr>
<td>1/2 in. (12.7 mm)</td>
<td>Over 400 sq. in. (2580 sq. cm.)</td>
</tr>
</tbody>
</table>
Nutrition Facts Label
This can be placed on either the PDP or the Information Panel. This component will be covered in depth in its own section later in this ebook.

Ingredient Statement

• The ingredient statement must be listed on the same panel as the manufacturer information. Usually, the ingredient statement is listed alongside, or at least near, the Nutrition Facts Panel, although this is not required.

• The ingredients must be listed in descending order of weight and by their common — instead of scientific — names (example: “sugar” instead of “sucrose”).

• The format specifications say that you have to use a type that is at least 1/16” tall and easy to read.
Allergen Statement

Food packages are required to list the “big eight” allergens, per the Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA). These are not the only allergens by any means, but they do account for 90 percent of food allergies.

They are:

- milk
- egg
- fish
- crustacean shellfish
- tree nuts
- wheat
- peanuts
- soybeans

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.

Examples:

Flour (wheat), whey (milk) ... or

Contains: Wheat and milk.
Address of the manufacturer, packer, or distributor

The food package must show the following:
1. 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”;
2. Street address;
3. City or town;
4. State (or country, if outside the United States); and
5. 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.

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 ozone-depleting substance.
- Protein products labeled as weight-loss products.
- Unpasteurized juices.
- Foods containing psyllium husk.
- Shell eggs.
**Nutrition Facts**

<table>
<thead>
<tr>
<th>Serving size</th>
<th>3/4 cup (100g)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Calories</td>
<td>120</td>
</tr>
</tbody>
</table>

% Daily Value*  

- **Total Fat** 9g 12%  
  - Saturated Fat 1.5g 8%  
  - Trans Fat 0g  
  - Polyunsaturated Fat 1g  
  - Monounsaturated Fat 6g  
- **Cholesterol** 0mg 0%  
- **Sodium** 220mg 10%  
- **Total Carbohydrate** 9g 3%  
  - Dietary Fiber 1g 4%  
  - Total Sugars 1g Includes 0g Added Sugars 0%  
- **Protein** 2g  

| Vitamin D | 0mcg | 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%  
| Thiamin   | 0.1mg | 8%  
| Riboflavin| 0.1mg | 8%  
| Niacin    | 1mg   | 6%  
| Vitamin B₆| 0.1mg | 6%  
| Magnesium | 29mg  | 6%  
| Zinc      | 1mg   | 10%  
| Selenium  | 2mcg  |  
| Copper    | 0.1mg | 1%  
| Chloride  | 16mg  | 0%  
| Choline   | 10mg  | 2%  

*The % Daily Value 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.

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**Location:** On the PDP or the Information Panel, alongside or near the ingredient statement.
Format options

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.

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.

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.

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.

Other options
Additional format options are available for small packages. If necessary, you can use:

- Approved abbreviations;
- The simplified format, if eight or more of the following nutrients are present in “insignificant amounts”: Calories, total fat, saturated fat, trans fat, cholesterol, sodium, total carbohydrate, dietary fiber, total sugars, added sugars, protein, vitamin D, calcium, iron, and potassium.

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.

From the CFR: An “insignificant amount” shall be defined as that amount that allows a declaration of zero in nutrition labeling, except that for total carbohydrate, dietary fiber, and protein, it shall be an amount that allows a declaration of “less than 1 gram.”
Required information

SERVING SIZE
In general, you will need to use the FDA’s table of Reference Amounts Customarily Consumed Per Eating Occasion (RACC) to determine the appropriate serving size for your product. Nutrients listed on your label will reflect this serving size. Serving Size needs to also include “common household measure or common household unit.”

Example: 1 piece (in addition to the gram weight of the serving size defined in RACC).

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

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

- total calories
- total fat
- saturated fat
- trans fat
- cholesterol
- sodium
- total carbohydrate
- dietary fiber
- total sugars
- added sugars
- protein
- vitamin D
- calcium
- iron
- potassium
Nutrient Content Claims
A Nutrient Content Claim is any statement regarding a nutrient level in your food – “low fat,” “high fiber,” “sugar free,” etc. Regulations are specific about what those claims can be, and you can find information about that [here](#).

There are only certain claims that are approved by the FDA.

Claims can be displayed on the PDP, Information Panel or anywhere else on the package, but the font used for the claim can’t be more than twice the size as the font used for the Statement of Identity.

Important: If you choose to use a Nutrient Content Claim on your package, you must have a Nutrition Facts Panel showing that nutrient and its value.

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

Best before, expiration, or sell-by date
Again, no federal regulatory agency requires that your food package have product dating. But some states do require dating of some foods. You will need to check into the specific regulations for your state and food.

As far as placement on the package, the requirements are as follows:

- 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.)
For further information please refer to the Code of Federal Regulations at www.ecfr.gov. Use the drop-down menu to select Title 21 and click on 100-169 under Browse Parts.

ESHA Research has been the leading provider of nutrition databases, food and supplement labeling, and nutrition analysis software solutions for more than 35 years. Our team of consultants are knowledgeable in nutrition, labeling, and regulatory compliance, ensuring your unique needs are met.

If we can be of assistance, please do not hesitate to contact us:

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