



# FOOD LABELING 101

an eBook from ESHA Research



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 ESHA Research are well versed in the FDA food labeling and packaging regulations. We present here the basic requirements in this easy-to-grasp guide.

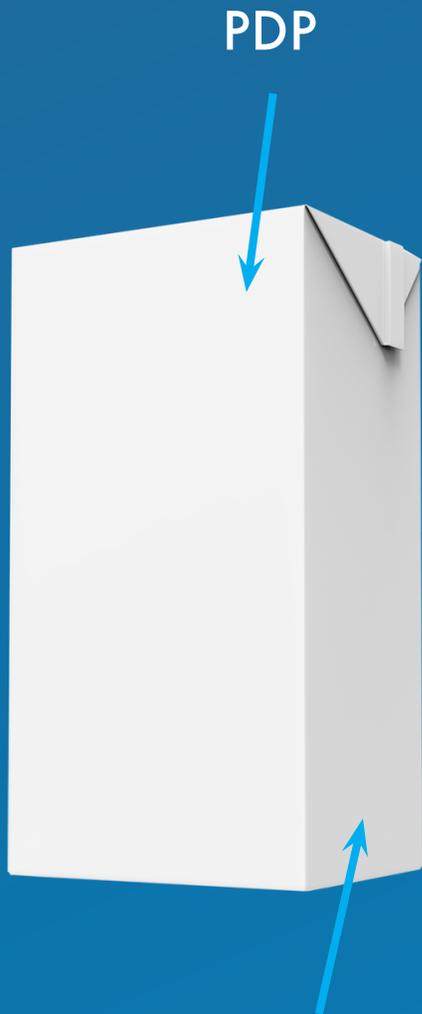
# 1 BASICS

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 <sup>2</sup> DEFINED



INFORMATION  
PANEL

## ***(Principle 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 Principle 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 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.



# WHERE **3** TO PLACE

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 label
- Ingredient and Allergen Statements
- Name and address of manufacturer, packer, or distributor
- Food warning and safe handling statements

# PACKAGE ELEMENTS: A DISCUSSION

# 4

## ***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).

**Location:**  
PDP  
**Required information:**  
Legal name of the food

*Corn Flakes*

ROASTED  
Peanuts

CHOCOLATE CHIPS

2% milk

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.

# PACKAGE ELEMENTS: A DISCUSSION

## *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.

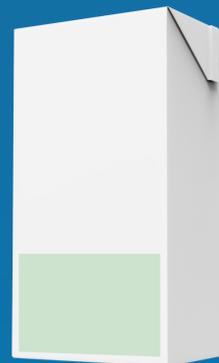
This is placed in the bottom 30 percent of the PDP in a type height determined by total PDP area.

### **Location:**

Bottom third of PDP

### **Required information:**

Amount of food in package



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.)

# PACKAGE ELEMENTS: A DISCUSSION

## ***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 Label, 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.

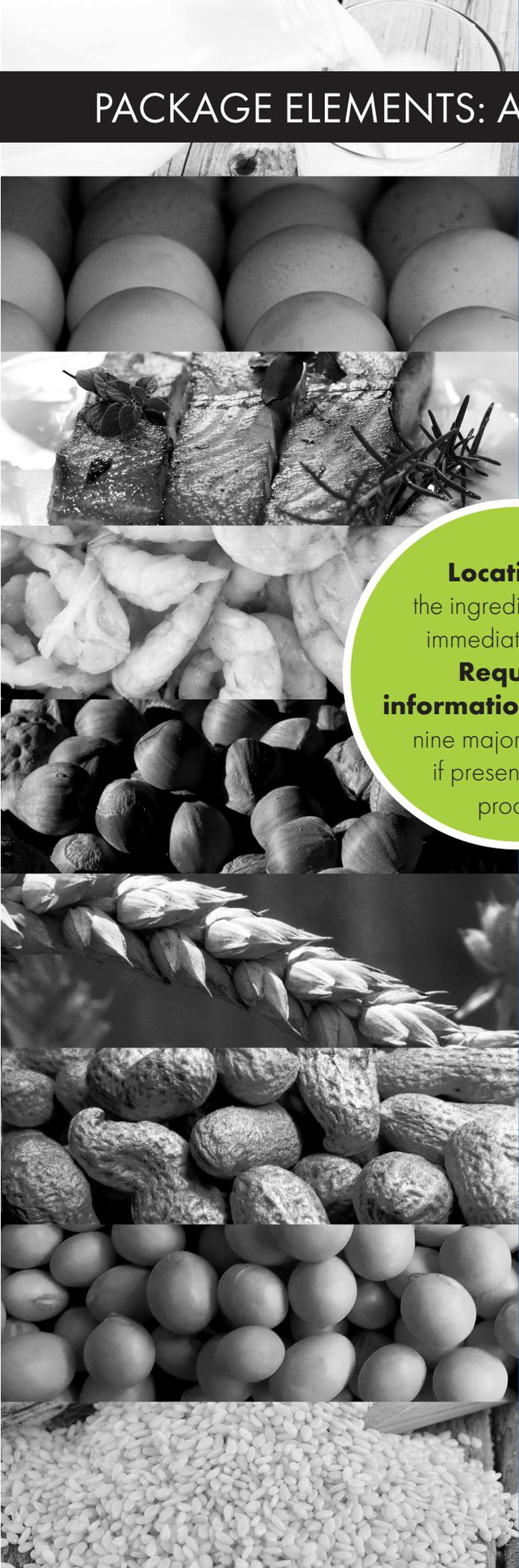
**Location:** PDP  
or Information Panel  
(on the same  
panel as the manufacturer  
info).

**Required  
information:**  
Ingredients by  
weight

INGREDIENTS: FRESH KALE, YELLOW BELL PEPPER, QUINOA, GREEN ONION, GREEN BELL PEPPER, DRIED CRANBERRIES, ALMONDS, POMEGRANATE, BLUEBERRIES, BASIL, RED BELL PEPPER, PEPPERMINT, LIME JUICE, LEMON JUICE.

BAZIG' BED BELL PEPPER' PEPPERMINI' LIME JUICE' LEMON JUICE'  
BELL PEPPER' DRIED CRANBERRIES' ALMONDS' POMEGRANATE' BLUEBERRIES'  
INGREDIENTS: FRESH KALE' YELLOW BELL PEPPER' QUINOA' GREEN ONION' GREEN

# PACKAGE ELEMENTS: A DISCUSSION



**Location:** In the ingredients list or immediately after.  
**Required information:** Any of the nine major allergens if present in your product

## Allergen Statement

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):

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

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).

**Location:**  
Most often on the Information Panel  
**Required information:** Name and address of the manufacturer, packer or distributor.

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 LABEL

<b>Nutrition Facts</b>	
10 servings per container	
<b>Serving size</b>	<b>3/4 cup (100g)</b>
<b>Amount per serving</b>	
<b>Calories</b>	<b>120</b>
	<b>% Daily Value*</b>
<b>Total Fat</b> 9g	<b>12%</b>
Saturated Fat 1.5g	<b>8%</b>
<i>Trans</i> Fat 0g	
Polyunsaturated Fat 1g	
Monounsaturated Fat 6g	
<b>Cholesterol</b> 0mg	<b>0%</b>
<b>Sodium</b> 220mg	<b>10%</b>
<b>Total Carbohydrate</b> 9g	<b>3%</b>
Dietary Fiber 1g	<b>4%</b>
Total Sugars 1g	
Includes 0g Added Sugars	<b>0%</b>
<b>Protein</b> 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 B <sub>6</sub> 0.1mg	6%
Magnesium 29mg	6%
Zinc 1mg	10%
Selenium 2mcg	4%
Copper 0.1mg	10%
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.

# NUTRI-5 TION FACTS LABEL

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 PDP or 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.

### Location:

On the PDP or the Information Panel, alongside or near the ingredient statement.

# NUTRITION FACTS LABEL

## **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

# 6 OTHER INFORMATION

## ***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 FDA allows.

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 label showing that nutrient and its value.

## ***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***

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](http://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:

[sales@esha.com](mailto:sales@esha.com)

503-585-6242 ext. 2