

*cheat sheet*

# NUTRITION FACTS LABEL TRANSITION CHECKLIST

*noun* | lab•el tran•si•tion check•list | \ 'lā-bəl tran(t)- 'si-shən 'chek- list\  
: a checklist to help you move from the pre-existing to new nutrition facts labels

## ▶ HOW TO USE

The compliance date for transitioning to the 2016 FDA Nutrition Facts Label rules is Jan. 1, 2020 (Jan. 1, 2021 for manufacturers with less than \$10 million in annual food sales.) Use this checklist to help you follow the necessary steps for compliance.

## *checklist items*

- Request updated spec sheets from your suppliers**  
Update any ingredient data that has changed.
- Gather nutrient information for newly mandated nutrients**  
(*Added Sugars, Vitamin D, Potassium*)  
These nutrients must be accounted for on the new label. Make sure you have the analysis data for these nutrients.
- Gather updated nutrient information for the new dietary fiber definition**  
Dietary fiber has been defined more rigidly for the new labels and includes beneficial fibers, but not non-beneficial, non-digestible carbs. Learn more: <https://www.esha.com/dietary-fiber-nutrition-facts-label/>.
- Convert nutrient values whose units have changed**  
(*Vitamin A, Niacin, Folate, Vitamin E, Vitamin D*)  
If listed on the label, these nutrients must use their new units. More information on converting nutrients can be found in this blog: <https://www.esha.com/nutrient-unit-conversions>.
- Check RACC and serving size for your food category to see if it's changed**  
The RACCs were extensively updated to more accurately reflect real-world eating patterns. Please see the Electronic Code of Federal Regulations for the latest RACCs: <http://bit.ly/2ssM1aw>
- Verify that your Nutrient Content Claims are still valid**  
The new regulations brought changes in Daily Values for most regulated nutrients. This plus updated RACC values can change the supported nutrient content claims. Genesis R&D can help you determine what claims your food is eligible for.
- Check to see if your package size requires Dual Column labeling**  
If your food requires further preparation or is in a container that holds between 2 and 3 servings, check to see if you are required to use a Dual Column label.
- Review new layout specifications**  
Some font sizes and placements have changed. Make sure these changes are correctly communicated to your design team.
- Document!**  
Keep meticulous records of your process to show proof of good-faith effort.

