

cheat sheet

SUPPLEMENT 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 supplement facts labels

▶ HOW TO USE

The compliance date for transitioning to the 2016 FDA Supplement 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 appear on the new label if present in a significant amount. 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/>.
- Verify that your Nutrient Content Claims are still valid**
The new regulations brought changes in Daily Values for most regulated nutrients, which can change the supported nutrient content claims.
- Document!**
Keep meticulous records of your process to show proof of good-faith effort.

