

*cheat sheet*

# NUTRITION FACTS LABEL COMPLIANCE CHECKLIST

*noun* | lab•el com•pli•ance check•list | \ 'lā-bəl kəm- 'plī-ən(t)s 'chek- list\

: a checklist to help guide you through the U.S. FDA Nutrition Facts labeling regulations

## checklist items

### COLLECT AND REVIEW YOUR NUTRIENT DATA

- Set a schedule.** Determine a regular schedule for requesting spec sheets from your suppliers and update any ingredient data that has changed.
- Examine nutrient information.** Ensure the final label has data points for all mandatory nutrients. Check data inputs using the Genesis R&D Foods Spreadsheet report. Review each nutrient to make sure all data is reasonable and there are no glaring mistakes or missing mandatory nutrients.
- Review Added Sugars and Total Sugars definitions and label requirements.** Update Added Sugars quantities to reflect the latest regulations. Added Sugars should not be greater than Total Sugar.
- Verify nutrient information for Dietary Fiber.** Make sure you are using only dietary fibers that are considered “beneficial” to calculate total Dietary Fiber for your label. Other, non-beneficial fibers (such as xanthan gum) should still be included in the total carbohydrate number. Request additional information from suppliers if necessary.
- Make sure you are using the correct nutrient values and units of measure.** Nutrition Facts values are reported in specific units, and %DV is calculated from these. Use the Calculate Nutrients feature in Genesis R&D to double-check that your values and units of measure are correct.

### REVIEW YOUR INGREDIENT LIST AND ALLERGEN STATEMENT

- Review your ingredient list.** Make sure all ingredients appear in their common/usual names. List any chemical preservatives by their common names and specify their functions. Check regulations for Standards of Identity, if applicable.
- Double- and triple-check your allergen statement.** Undeclared allergens are one of the top reasons for a product recall. Review each ingredient for the presence of allergens (milk, eggs, fish, shellfish, tree nuts, peanuts, wheat, soy, and sesame). Remember to identify the specific species of fish/shellfish and specific type of nut when declaring tree nuts. Familiarize yourself with alternate names for sesame (e.g., Tahini) and review your spice and flavor ingredients for possible sesame allergen declaration.
- Check for sulfite content in your ingredients.** If sulfites are purposefully added or if your product contains 10 ppm or more of sulfites, it must be declared on product packaging.



## NUTRITION FACTS LABEL FORMAT AND PACKAGING CLAIMS

- Determine Serving Size and Servings Per Container.** Use the FDA's guide for Reference Amounts Customarily Consumed (RACC) to find the appropriate serving size and household measure. Use this serving size to then calculate how many servings are in one container.
- Review label layout specifications.** Make sure the label sizes, layouts, fonts, and placement are correctly communicated to your design team.
- 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, you may need to use a Dual Column label.
- Verify that your Nutrient Content Claims are valid.** Your claims should reflect the latest %DVs and the latest established RACC values. Genesis R&D can help you determine what claims your food is eligible for.
- Check your ingredients for bioengineered materials.** Track bioengineered ingredients using the Attributes feature in Genesis R&D and report accordingly.

## KEY REMINDERS

- Document!** Keep meticulous records of your process to show proof of due diligence.
- Account for processing losses.** When creating a Recipe, don't forget to account for moisture loss, fat loss, and other processing losses.
- Substantiate your final Nutrition Facts label.** If anything doesn't make sense, go back, and check the ingredients and your numbers. Make any necessary changes at the ingredient level to ensure the changes flow through to any associated Recipes.
- Don't forget these additional required packaging elements:** Product Name, Net quantity, Manufacturer Name and Address, and UPC Barcode.

## ADDITIONAL RESOURCES

- Download this ESHA Cheat Sheet to learn more about Added Sugars:**  
<https://esha.com/news-events/cheat-sheets/added-sugar-cheat-sheet/>
- Download this ESHA Cheat Sheet to learn more about Dietary Fiber:**  
<https://esha.com/news-events/cheat-sheets/dietary-fiber-cheat-sheet/>
- Download this ESHA Cheat Sheet to learn more about Allergen Labeling by Country:**  
<https://esha.com/news-events/cheat-sheets/allergen-labeling-by-country/>
- Bookmark this page to easily access the RACC chart:** <http://bit.ly/2ssM1aw>