

FDA Food Labeling Guide Made Easy

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UPDATED NOVEMBER 2016: *This post reflects several updates in 2016 to incorporate the FDA's new nutrition facts format and a few other things that people have been asking about. Enjoy!*

Having designed gourmet food packaging for well over a decade now, we frequently reference the FDA website regarding their food labeling regulations and requirements. To say there is a lot to know would be an understatement. If you've ever searched for information there you've likely gotten lost in pages upon pages of food packaging legalese and obscure reference codes whose sources are difficult to locate. We know we're not the only ones, so we pored over the [FDA Food Labeling Guide](#) in its entirety and condensed the basic requirements into this simplified, easy-to-understand reference list.



There are many exceptions, exemptions and variations to the rules for specific product types, so be sure to check out the full [FDA Food Labeling Guide](#) for complete details. Each content section below contains links to the corresponding information on the FDA site for further elaboration.

OVERVIEW OF LABELING PANELS

Let's first define a few things:

Principal Display Panel (PDP): The part of the package most likely to be seen first by the consumer on the retail shelf. If two or more surfaces qualify for this definition, they both are considered Alternate PDPs.

Required content for the PDP: Statement of Identity (what the product is) and the net quantity statement (amount of product). If alternate PDPs exist, this information must appear on each of them. For more detail, see the [Statement of Identity](#) and [Net Quantity Statement](#) sections below.

Information Panel: The panel directly to the right of the PDP as seen by the consumer. If this panel is unusable (e.g., gusseted box, folds, flaps, etc.), then the Information Panel is the next panel immediately to the right.

Required content for the Information Panel:

Note: there can't be any other information or design elements between the required Information Panel content.

1. **Name and address of the manufacturer, packer or distributor.** Unless it's the actual manufacturer whose name and address are on the package, the name and address must also include the firm's relation to the product—e.g., "manufactured for" or "distributed by." If the firm's name and address are listed in a current city directory or phone book, you can omit the street address and just include city or town, state, ZIP (or mailing code for outside US). The product's country of origin is not required if manufactured in the US, but it is required for all imported foods. If you're including the country of origin it must be located close to the firm's name and address and be about the same size.
2. **Ingredients** listed in order of greatest to least by weight. Must be on same panel as the name and address, but can be located before or after nutrition facts and name and address. You can list sub-ingredients of a food in parentheses following it—e.g., SEMISWEET CHOCOLATE CHIPS (SUGAR, UNSWEETENED CHOCOLATE, COCOA BUTTER, SOY LECITHIN [EMULSIFIER], VANILLA)—or factor in all sub-ingredients as main ingredients listed in order of greatest to least without naming the original ingredient that the sub-ingredients comprise.
3. **Nutrition Facts:** see the [Nutrition Facts](#) section below for more detail on this.
4. **Allergen labeling** if applicable. There are eight major allergens that are required to be listed if contained in the product's ingredients: milk, egg, fish (must list species), crustacean shellfish (must list species), tree nuts (must list specific nuts), wheat, peanuts and soybeans. You can either list name of food source within the ingredients in parentheses following name of major food allergen—e.g., "whey (milk)"—or you can place the word "Contains" followed by source(s)—e.g., "Contains: milk, egg and almonds."—immediately after or adjacent to ingredients. The allergen text must be at least as large as the ingredients text.

If you're including advisory allergen labeling—e.g., “May contain...” or “Processed in a facility that also processes...”—this is not required, but it must be factual and not misleading. As this information is not required, it is not permitted to intervene with required information.

Labeling Area

In determining the labeling area size of a package, unusable areas such as flaps, closures, shoulders and necks are excluded. Bottoms of boxes that are easily seen by consumers are included in the total area (e.g., frozen food boxes). The labeling area size is determined by the total area available for labeling on the container, not just the size of the label applied to it.

Exceptions

1. Alternatively, you can place all the required Information Panel content on the PDP.
2. The required Information Panel content may be split up onto two Information Panels if there is insufficient space (sufficient space is determined by the entire labeling area on the package regardless of design elements and non-required information used) as long as the information in each section is kept together and not split up among the two panels (e.g., firm name and address are on the same panel, ingredients are on the same panel).
3. If the labeling area is less than 12 in² (77.42cm²), you can include a phone number or address to access nutrition information—likewise if the container is unusually shaped with no sufficient labeling area.

Type Specifications for Information Panel Content

(See [Nutrition Facts](#) section below for its own type requirements.)

1. The type size must be at least 1/16 inch (1.6mm) tall based on the lowercase letter o (or uppercase O if using all capital letters).
2. The height of letters can't be more than 3x their width.
3. All required information must have sufficient contrast and be easily legible.
4. If you're using a foreign language anywhere on the package, all required information must be in both English as well as the foreign language.
5. Artwork can't be misleading and can't detract from the prominence of the required information.

FDA link: [General Requirements](#), [Ingredient Lists](#).

STATEMENT OF IDENTITY

As mentioned above, the Statement of Identity is the name of the food. It must be prominent—which is considered to be at least half the height of the largest text on the label—and bold, as it is one of the most important features on the PDP.

The name of the food is its name as determined by law or regulation. If none exists, then it must be the “common or usual” name of the food. If that doesn’t exist, then use a reasonable, descriptive name that is clear and not misleading. Common or usual names must be used when a food has one, otherwise it’s considered misleading.

Brand names (e.g., logos) are not part of the food name and should be reasonably less prominent than the food name.

“Fanciful names” that are commonly used and understood are permitted as the Statement of Identity when it’s obvious what the food is (e.g., “Vanilla Wafers”).

The Statement of Identity must also describe the *form* of the food if it is sold in different forms, e.g., sliced, half or whole.

A product’s name can be different from its Statement of Identity. For example, if you call your cracker product “Snackadeedles,” this would likely be the largest text on the PDP, and the actual name of what the food is (e.g., “crackers”) should be half the height of Snackadeedles.

FDA link: [Statement of Identity](#).

NET QUANTITY STATEMENT

This is the amount of the product. It must be in weight, measure or numeric count (e.g., 10 cookies). If in weight or measure, the amount must be in both US and metric versions. The metric version may be located before or after the US version, or above or below it. The metric equivalent in grams rounds to the nearest whole number.

Type size is determined by the area of the PDP (width x height if rectangular or square; or 40% of product height x circumference if cylindrical). Required type must follow the [Type Specifications](#) above and be at least the smallest size permitted based on the PDP’s area:

If your PDP area is:

≤ 5 in² (32.26cm²)

> 5 in² (32.26cm²) but ≤ 25 in² (161.29cm²)

> 25 in² (161.29cm²) but ≤ 100 in² (645.16cm²)

> 100 in² (645.16cm²) but ≤ 400 in² (2,580.6cm²)

> 400 in² (2,580.6cm²)

Then your minimum type size is:

1/16 in (1.6mm)

1/8 in (3.2mm)

3/16 in (4.8mm)

1/4 in (6.4mm)

1/2 in (12.7mm)

Reference the Labeling Area section above for more details on what parts of the package constitute labeling area and what parts do not.

NUTRITION FACTS

Nutrition Facts are required on most food packages with labeling (there are a few exceptions), and must be located together with ingredients and name and address on either the PDP or the Information Panel. If there is no room on the Information Panel, then it is required to go on the next panel to the right, or if no room there, then on any panel visible by the consumer.

In 2016 the FDA released its update to the nutrition facts format. We cover both the old and new formats below, because you can still use the old format until July 26, 2018 (or July 26, 2019 for manufacturers with less than \$10 million in annual food sales). **EDIT: As of July 13, 2017, the FDA has announced that they will extend the compliance deadline. They will release more information on the specific new dates soon and we will update here.**

The Nutrition Facts content must always be enclosed in a box shape with at least a 1/2-point rule and must have sufficient contrast such as dark print on light background. Light print on dark background may be used as long as there is still sufficient contrast. The box background must be neutral (no graphic elements).

The FDA's examples are in Helvetica, but any legible font may be used. Condensed fonts are permitted as long as all type requirements are still met.

Nutrition Facts Type Specifications—OLD FORMAT

Table headings (e.g., Amount per Serving, % Daily Value) must be at least 6-point type, and key nutrients must be at least 8-point type.

“Nutrition Facts” must be the largest text in the panel (larger than 8 points) and should extend the width of its box in Full Panel Format. (See below for other permitted formats.)

There is no specific thickness required for the three horizontal rules that separate the main section.

You may use type sizes no smaller than 6 points or all uppercase text as long as it is at least 1/16 inch (1.6mm) tall.

Nutrition Facts Type Specifications—NEW FORMAT

The FDA has provided detailed examples of each table format, so instead of repeating all that verbally here, I'm just going to link to their example straight from the source since it's so thorough. [FDA new nutrition facts font sizes and details.](#)

The main changes to the new format are:

- The numerical value for “Calories” is the largest information in the table
- Added sugars are called out
- The %DV footnote has changed
- Vitamins A & C are no longer listed
- Vitamin D and Potassium are listed
- RACCs (Reference Amounts Customarily Consumed) have changed for some foods. [Find the new RACCs here.](#)
- Some DVs (Daily Values) and RDIs (Recommended Daily Intakes) have changed. [Find the new DVs here](#) and [the new RDIs here.](#)

Nutrition Facts Formats

Reference the [FDA Label Formats](#) page (old format, but still a lot of applicable information) and the [new format examples page](#) for examples of Nutrition Facts formats.

If there is not enough room for the Nutrition Facts Full Panel Format:

If the labeling area is greater than 40 in² (258.06cm²), you can use the Side-by-Side Format where the footnote is to the right of the Nutrition Facts box.

If labeling area is 40 in² (258.06cm²) or less, you can:

1. Eliminate the entire footnote, including only the Percent Daily Values Footnote.
2. Use the Linear Format (text in a box) if the tabular or column format does not fit.
3. Use the following abbreviations: serv size, servings, fat cal, sat fat cal, sat fat, monounsat fat, polyunsat fat, cholest, total carb, fiber, sol fiber, insol fiber, sugar alc, other carb. If DV is abbreviated in its table heading, the Percent Daily Values Footnote needs to say “Percent Daily Values (DV)” with DV in parentheses.
4. Place the Nutrition Facts label on any panel on the package.

If there is insufficient vertical space (e.g., less than 3 inches (76.2mm)) you can use the Tabular Format (horizontal).

Cellophane windows on boxes and visible parts of cellophane bags are considered labeling area if any labeling is on it—including non-required information such as a price callout label. If there is no labeling on the cellophane, then it's not considered part of the labeling area.

If the Nutrition Facts contain less than the following amounts, you can omit their listings on the Nutrition Facts and say “not a significant source of...” and list the nutrients (in at least 6-point size).

fat cal < 0.5g

sat fat < 0.5g

trans fat < 0.5g

cholest < 2mg

sugar < 1g

vitamin A, vitamin C, calcium & iron < 2% RDA

Use of the Calories Per Gram Footnote is optional under any circumstances.

Simplified Format:

You may use the Simplified Format which lists only the five core nutrients (calories, total fat, sodium, total carbohydrate and protein) and declare any amounts that are significant enough to be listed if at least 8 of the following are insignificant:

Calories, total fat, saturated fat, trans fat, cholesterol, sodium, total carbohydrate, dietary fiber, sugars, protein, calcium, iron, vitamin A (if old format), vitamin C (if old format), Vitamin D (if new format), Potassium (if new format).

This format can be used regardless of labeling area size, as its use is determined by the nutrient content.

If you're using the simplified format, you must include "not a significant source of..." and list all of the nutrients that are not a significant source if nutrition claims are made, vitamins and minerals are added, or any non-required naturally occurring nutrients (e.g., potassium) are declared.

FDA link: [Nutrition Facts](#), [Label Formats](#).

OTHER NOTES ON NUTRITION LABELING

The FDA states that it will likely not pursue any minor mistakes in nutrition labeling if the mistakes are unintentional. Once any errors are realized however, they should be corrected in future printings.

Mail order retail food must adhere to same requirements as in-store retail food.

If nutrition labeling is not required but the product has nutrition labeling anyway, the nutrition labeling needs to follow all the same required rules.

Foods that do not require nutrition labeling are: whole or ground coffee beans, tea leaves, plain instant unsweetened instant coffee and tea, condiment-type dehydrated vegetables (e.g., dried garlic), flavor extracts and food colorings.

If spices have nutrient levels significant enough for labeling, then nutrition labeling is required.

If the product doesn't have nutrition labeling, it can't have any other nutrition or health claims.

Nutrition Content Claims

A Nutrition Content Claim is any statement regarding a nutrient level in the food—e.g., low fat, high in fiber, fat free.

There are only certain claims usable that are approved by the FDA. Any others may not be used.

Claims can't be more than 2x as prominent as the Statement of Identity.

Nutrition labeling (i.e., Nutrition Facts panel) is required for nearly all claims. No nutrition claims can be made if no nutrition labeling is present.

There has been new regulation in gluten-free labeling: any product with a gluten-free claim must have less than 20 parts per million of gluten.

FDA link: [Nutrition Content Claims](#).

Handy Tools for Determining Nutrition Facts Numbers

[Nutrition Facts rounding amounts rules.](#)

[Percent Daily Values calculations.](#)

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