

# Understanding FDA Food Labeling: A Guide for Food Manufacturers

The FDA has an abundance of specific nutrition labeling guidelines and requirements to ensure consistency and provide consumers with the knowledge they need to make informed food choices. Unfortunately, for first-time food manufacturers, nutrition labeling may seem complex and confusing.

This comprehensive guide provides the most important FDA guidelines for all aspects of the required nutritional information, including:

- 1 Nutrition Facts Panel**
- 2 Ingredient List**
- 3 Allergen Statements**
- 4 Nutrient Content Claims**

Rather than wasting time clicking around on the web and sifting through hefty government documents, use this document and the additional resources at the end to streamline the nutrition label generation process. This way, you can create your label quickly and efficiently in order to get your product on retail shelves and start driving a profit as soon as possible.

Nutrition Facts	
Serving Size 1/2 cup (about 82g)	
Servings Per Container 8	
Amount Per Serving	
Calories 200	Calories from Fat 130
% Daily Value*	
<b>Total Fat 14g</b>	<b>22%</b>
<b>Saturated Fat 9g</b>	<b>45%</b>
<b>Trans Fat 0g</b>	
<b>Cholesterol 55mg</b>	<b>18%</b>
<b>Sodium 40mg</b>	<b>2%</b>
<b>Total Carbohydrate 17g</b>	<b>6%</b>
<b>Dietary Fiber 1g</b>	<b>4%</b>
<b>Sugars 14g</b>	
<b>Protein 3g</b>	
<b>Vitamin A 10%</b>	<b>Vitamin C 0%</b>
<b>Calcium 10%</b>	<b>Iron 6%</b>

\*Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories: 2,000	2,500
Total Fat	Less than 65g	80g
Saturated Fat	Less than 20g	25g
Cholesterol	Less than 300mg	300mg
Sodium	Less than 2,400mg	2,400mg
Total Carbohydrate	300g	375g
Dietary Fiber	25g	30g

Calories per gram:  
Fat 9 • Carbohydrate 4 • Protein 4

## NUTRITION FACTS PANEL

The nutrition facts panel appears along with the ingredient list and allergen warning, typically on the panel to the right of the package's front [add image similar to this one] and within plain sight of the consumer. If the packaging doesn't contain a right panel, the panel may be placed anywhere else on the package that is easy for the consumer to see.



### Serving Size

Serving size is the quantity of the product that is to be consumed at once. It is defined in familiar units (cups or pieces) that people can visualize or measure, followed by its weight in grams. The FDA sets general guidelines for serving size in the form of Reference Amounts Customarily Consumed (RACCs) for persons 4 and older.

*Example: The RACC establishes that the reference amount for one serving of cereal is 60 grams.*

To determine serving size, find the RACC for your type of product in the [RACC guide](#) and weigh out your product to that amount. Next, measure it in cups or pieces in order to find the serving size in familiar units. Both of these values will be used on your label.

### Servings Per Container

To determine servings per container, simply divide the total weight of your product by your serving size.

*Servings per container should be rounded in the following way:*

- Between 2 and 5: Round to the nearest half serving (i.e., 2.35 servings becomes 2.5)
- 5 and over: Round to the nearest serving (i.e., 6.5 servings becomes 7)



### Calories

Calories per portion can be determined with online nutritional analysis software by simply entering your product recipe and serving size. Total calories and calories from fat are both required.

*Calories per serving should be rounded in the following ways:*

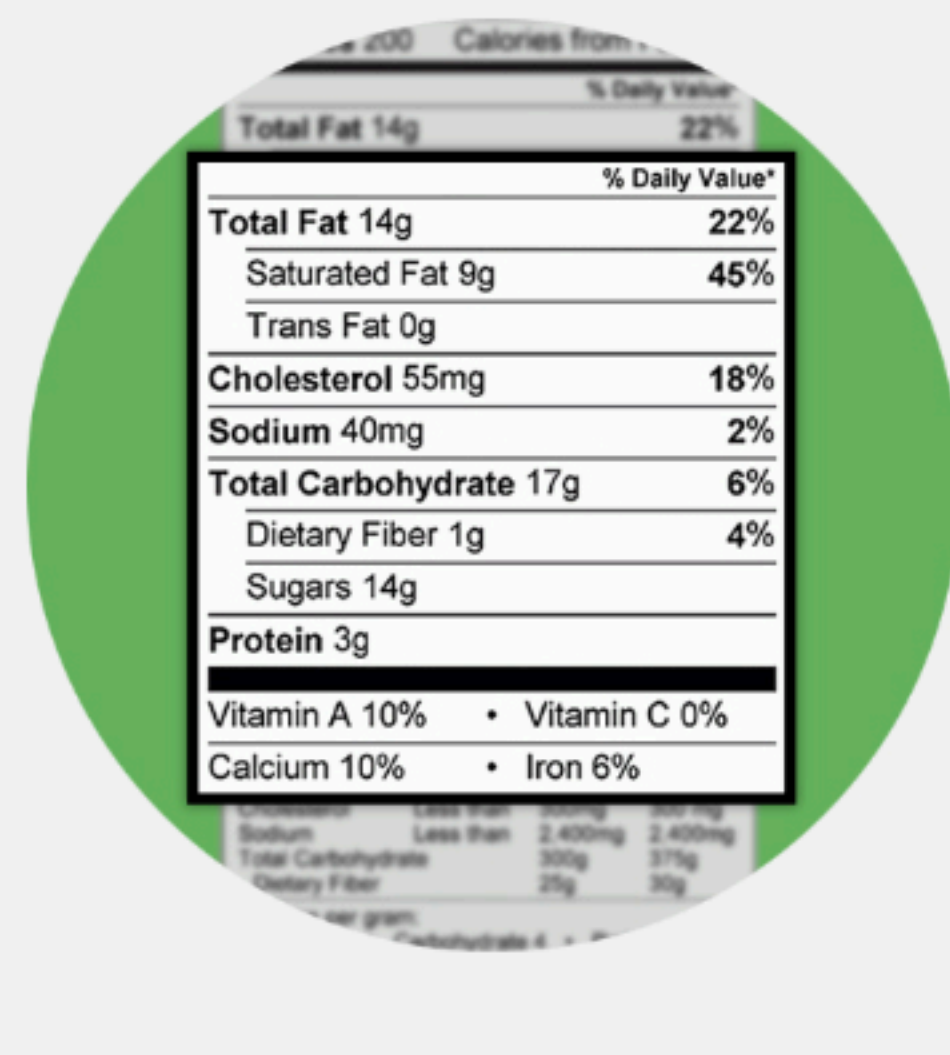
- Under 50 calories: Round up or down to the nearest 5 increment (i.e., 36 calories becomes 35)
- Over 50 calories: Round up or down to the nearest 10 increment (i.e., 88 calories becomes 90)

## NUTRITIONAL VALUES (amount per serving)

The nutrient values you are required to provide include **grams** per serving and **percentages** per serving of the following elements, based on a 2,000 calorie per day diet:

- Total fat**
  - Saturated fat
  - Trans fat
- Cholesterol**
- Sodium**
- Total carbohydrate**
  - Dietary Fiber
  - Sugars
- Protein**
- Vitamin A**
- Vitamin C**
- Calcium**
- Iron**

The quickest and easiest way to obtain these values is by using an FDA-compliant online nutritional analysis software. This way, you just need to enter your recipe, select your serving size, and the nutritional values will be generated for you.



### Fats (Total fat, saturated fat, trans fat, cholesterol)

Fats are currently receiving a lot of attention from the FDA. Based on new medical research, the evolving narrative is that not all fats are bad for our health. In the coming years, we can expect to see a shift in the daily values recommended by the FDA.

*Total fat, Saturated Fat, and Trans Fat should be rounded in the following way:*

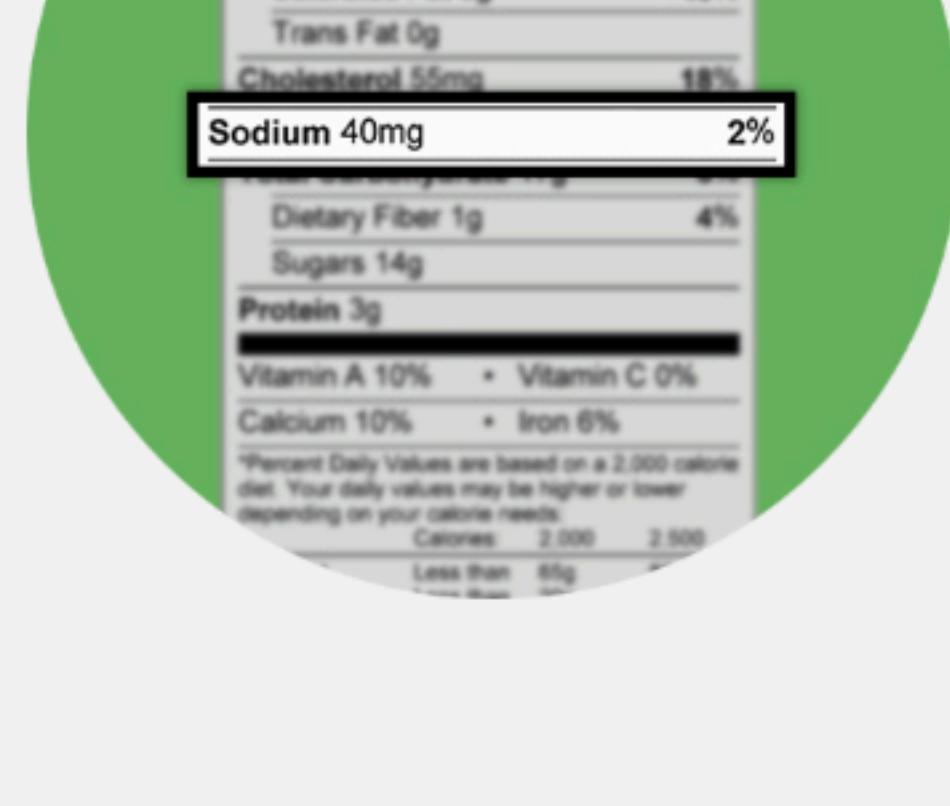
- Under 0.5 grams: Round to 0 grams
- 0.5-5 grams: Round to the nearest 0.5 gram (i.e., 1.22 grams becomes 1.5)
- 5 grams and above: Round to the nearest gram (i.e., 1.45 grams becomes 1 gram)

\*Note: Cholesterol should be rounded in the same way, only the unit will be in milligram.

If your product does not contain trans fat, rather than declaring "0 grams of trans fat," include the following statement: "Not a significant source of trans fat." This should appear at the bottom of the nutrition facts panel. Also, note that the FDA advises not to provide a % Daily Value for trans fat.

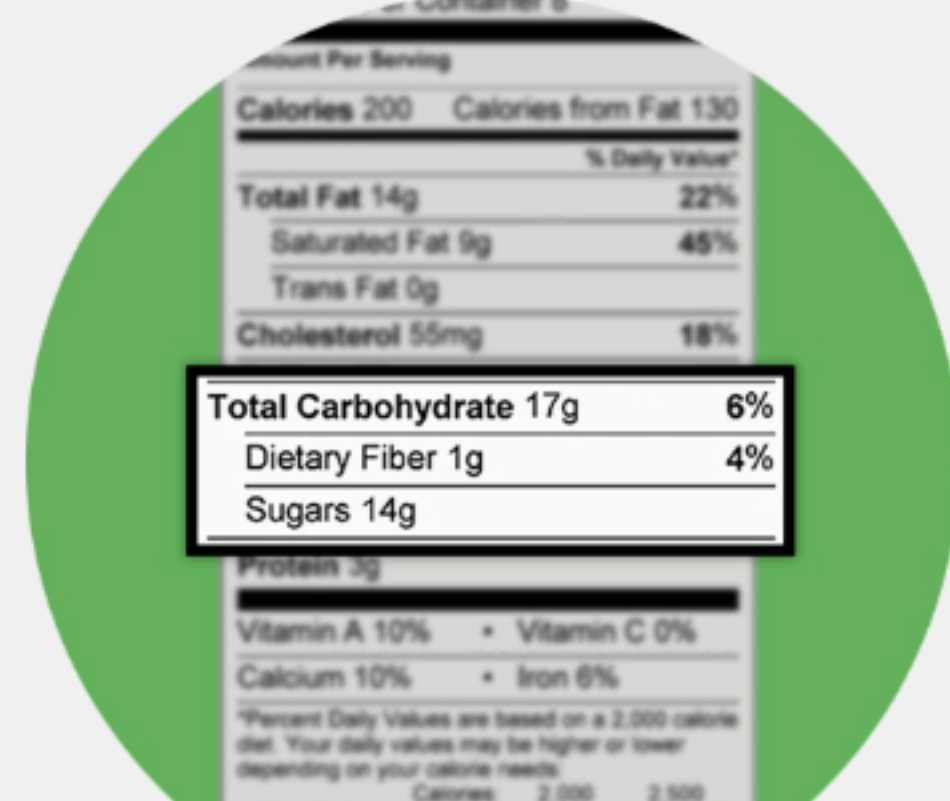
### Sodium

Sodium must be presented in milligrams. It is important to be mindful of the % Daily Value of sodium your product has, as many consumers are trying to limit their sodium intake for health reasons.



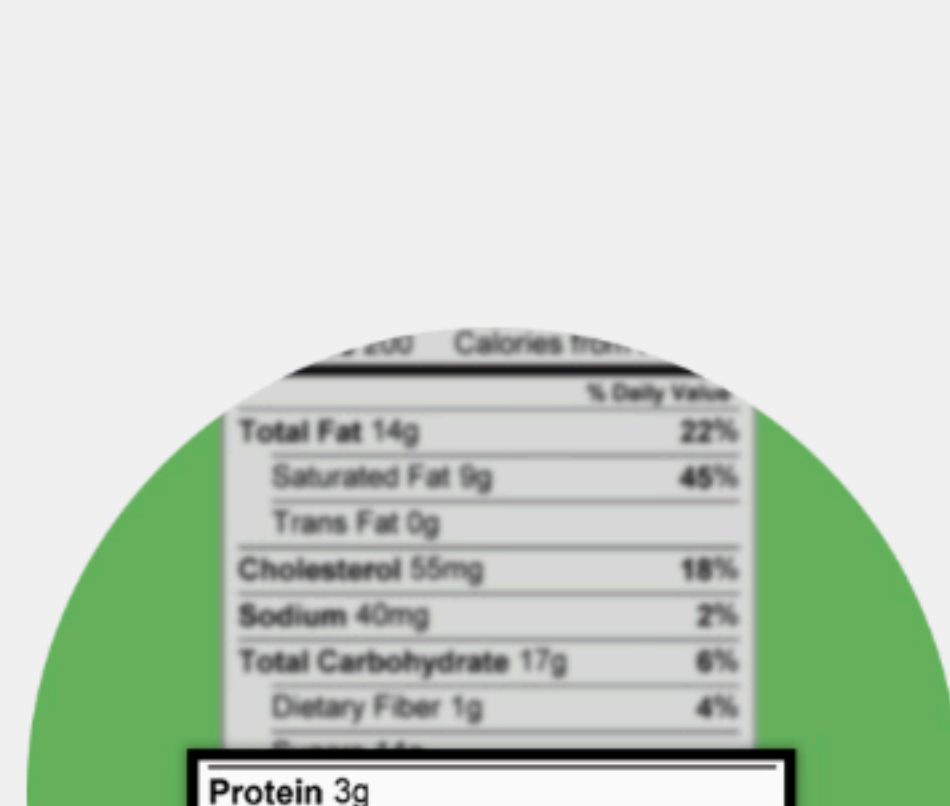
### Total Carbohydrate, dietary fiber, sugars

Total carbohydrates, dietary fiber, and sugars must be expressed in grams. Sugars do not require a % Daily Value. Low sugar foods are becoming increasingly popular, so it is a good idea to be mindful of how much sugar your product contains. As a reference point, the FDA recommends that no more than 10% or 200 of our daily calories should come from sugars.



### Protein

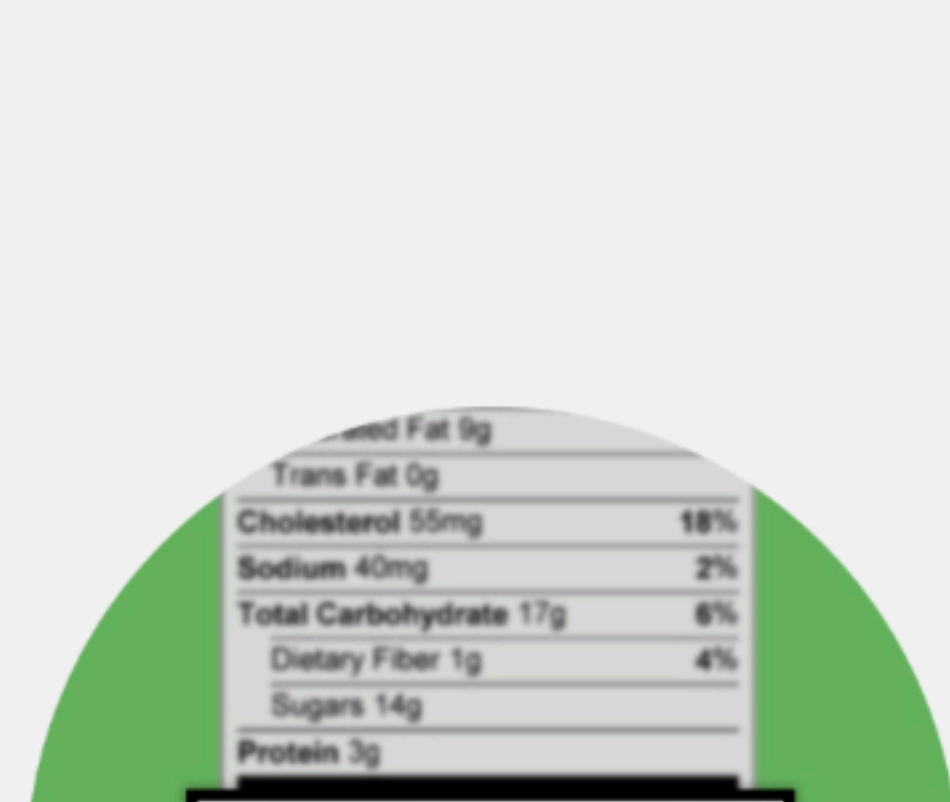
Protein content must be given in grams, but the % Daily Value is not required unless a specific Nutrient Content Claim about protein is made on the packaging or if the protein content is very low (less than 1 gram). In the case of very low protein content, include "0%" in the % Daily Value column or provide the following statement: "Not a significant source of protein."



### Vitamin A, Vitamin C, Calcium, and Iron

These are the only four mandatory nutrients on the nutrition facts panel. They must appear in the above order with the % Daily Value present per product serving.

You may include additional vitamin and mineral information, such as Vitamin D or folate if desired. You must include all added nutrient information here as well (i.e., if your product is enriched with vitamins or minerals).



### Footnote

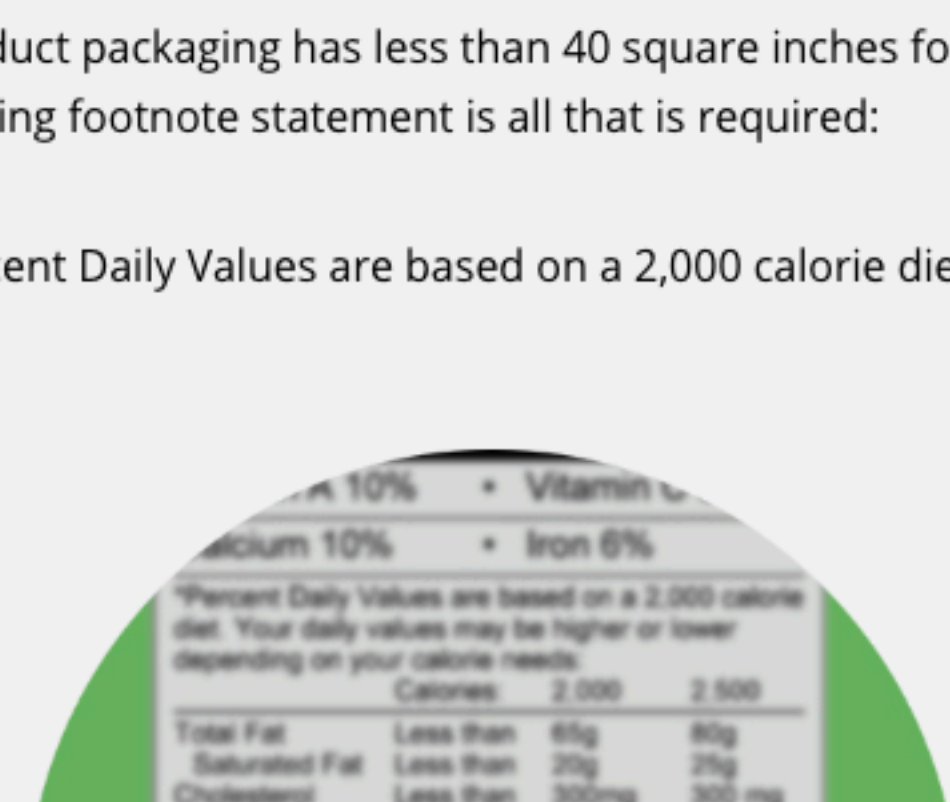
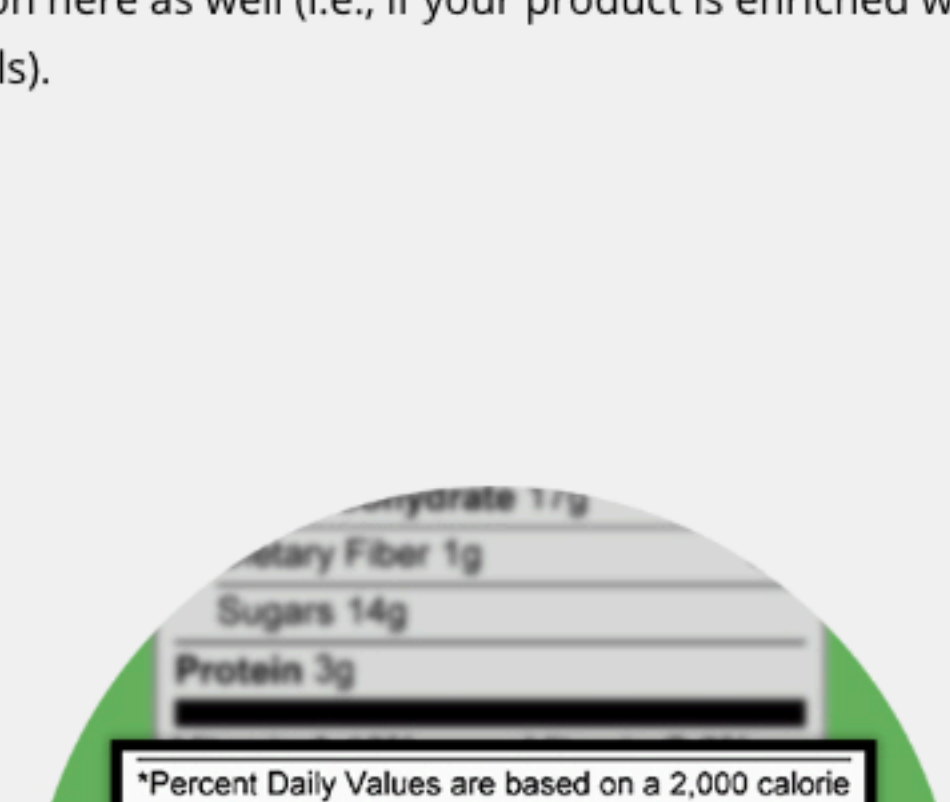
The footnote is the section below the nutrient information that gives context to the product's detailed nutrient information. The full footnote details the FDA recommended daily values for specific nutrients and is required if the product packaging uses more than 40 square inches for labeling.

The footnote must include:

- The following statement: "Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs."
- The following table of daily values: [image of this table]

If the product packaging has less than 40 square inches for labeling, the following footnote statement is all that is required:

- "Percent Daily Values are based on a 2,000 calorie diet."



### Caloric Conversion Information

This information provides the number of calories per gram each serving of the product contains for fat, protein, and carbohydrates. This information is optional.

## INGREDIENT LIST

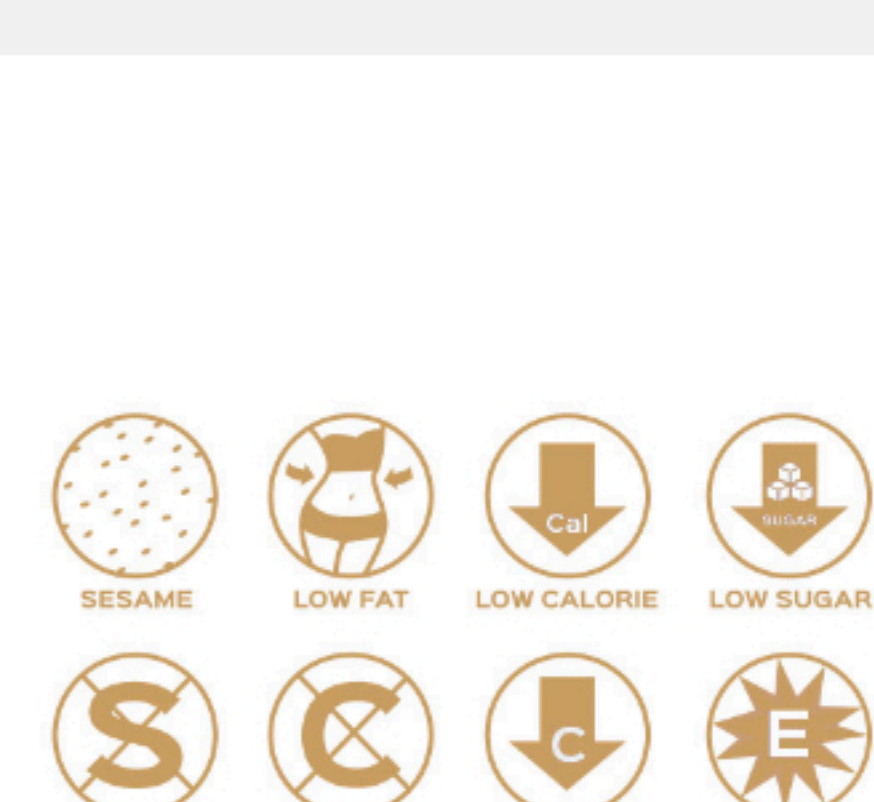
The ingredient list typically appears under the nutrition facts panel and must contain all ingredients present in the product. The FDA requires that ingredients appear in the order of predominance by weight in the product, with the ingredients that weigh the most listed first. For example, an ingredient list for guacamole may look something like this:

- Ingredients: Avocados, lime juice, cilantro, salt

The ingredient list must be prominently displayed on the packaging, with a font not less than 1/16 inch in height.

If a food features an ingredient that contains other ingredients (sub-ingredients), those should be listed in parentheses following the primary ingredient. For example, if your product contains chocolate chips, they would be listed like this:

- ...chocolate chips (cocoa, cocoa butter, sugar)

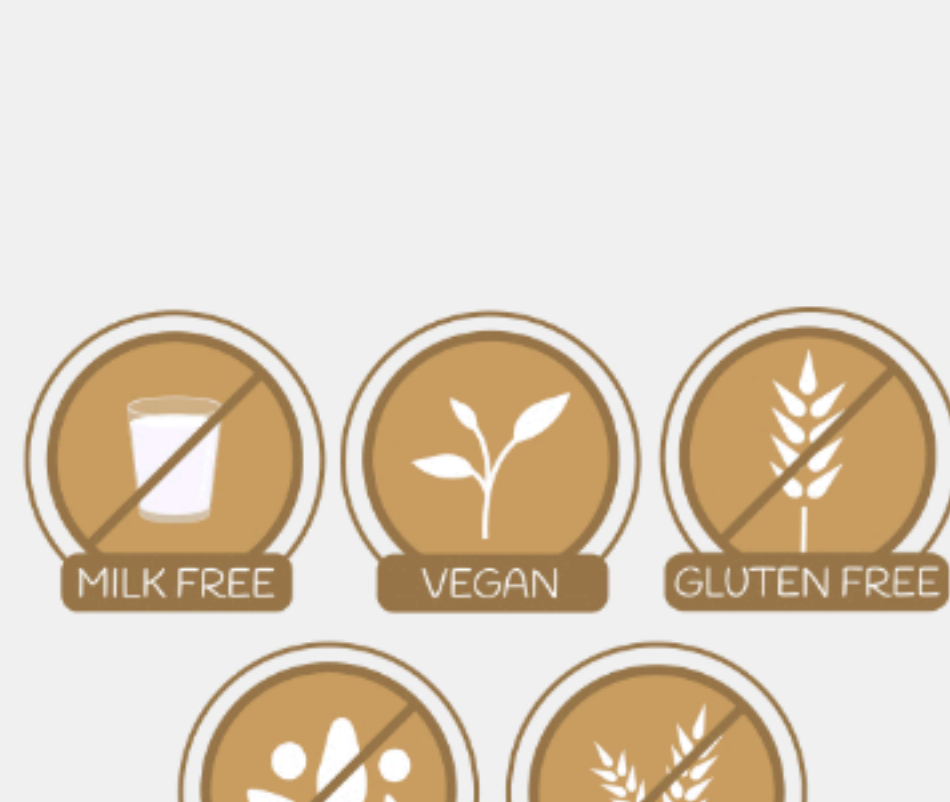


## ALLERGEN WARNING

Allergen warnings alert consumers of the presence of one or more of the top eight allergens. These allergens account for 90% of all food allergies and are as follows:

- Milk
- Eggs
- Fish
- Crustacean shellfish (ie. crab, lobster, shrimp)
- Tree nuts
- Wheat
- Soy beans
- Peanuts

If a product contains any of these allergens, it must include a "contains" statement on the package (i.e., "Contains soy"), typically located after the ingredient list. This statement must use the same font size and type as the ingredient list.



## NUTRIENT CONTENT CLAIMS (NCCs)

Nutrient content claims are the phrases on food product packaging that draw the consumer's attention to a particular nutritional feature. They are not mandatory, though adding them to your product label may have a positive impact on sales.

The most popular NCCs are:

- Low fat
- Low calorie
- Reduced Sodium

In order to use an NCC on your product, you must make sure it qualifies for the specific claim you use. Each NCC has different requirements, so be sure to check the [FDA's NCC guidelines](#).

**Food labels can be quite complex, particularly for those just starting out in the food manufacturing industry. It is, however, critical that you adhere to the FDA's guidelines when it comes to labeling your product. Failure to comply could result in your product being pulled from store shelves or even legal action. Since FDA guidelines are subject to change, it is important to stay abreast of updates to labeling guidelines and be informed about FDA regulations so you can keep your labels current. While the FDA does not approve labels before products go to market, as a food manufacturer you have a responsibility to provide consumers with standardized, truthful information. Only then can you grow a loyal customer base and achieve success with your food product.**

For more in-depth information about FDA nutritional labeling guidelines, see the following resources:

- Nutrition Facts Panel: Guidance for Industry: A Food Labeling Guide (7, Nutrition Labeling, Questions G1 through P8)
- RACCs: Section 101.12 Reference Amounts Customarily Consumed Per Eating Occasion
- Rounding: Guidance for Industry: A Food Labeling Guide (16, Appendix H: Rounding the Values According to FDA Rounding Rules)
- Nutrient Info: Electronic Code of Federal Regulations, Title 21-Food and Drugs, Part 101 - Food Labeling
- Footnote: Guide to Nutritional Labeling and Education Act
- Ingredient Lists: Guidance for Industry: A Food Labeling Guide (6, Ingredient Lists)
- Allergens: Guidance for Industry: Questions and Answers Regarding Food Allergens, including the Food Allergen Labeling and Consumer Protection Act of 2004 (Edition 4): Final Guidance
- NCCs: Guidance for Industry: A Food Labeling Guide (9, Appendix A: Definitions of Nutrient Content Claims)