

ENHANCING THE SAFETY OF LOCALLY PREPARED FOODS



Publication FST-312NP

What do I need to know about LABELING my foods for sale?

What is a food label?

Food labels are used to easily identify your product. Labeling is important because it provides your customer with detailed information, including ingredients, nutrition facts, and other details about your food and your company. It is also a way to brand and advertise your product.

Why do I need a food label?

The Food and Drug Administration (as well as state regulations) require labeling of all foods packaged for retail sale.

What are the parts of a food label?

The label on your package can be divided into two different portions sections, 1) the primary display panel and 2) the information panel.

1) Primary Display Panel (PDP)

The Primary Display Panel is the section of the package most visible to the consumer. It is usually the portion on the front of the package that faces the customer on the retail shelf. By regulation, the PDP must contain:

1. **Product name (identity statement):** This is the common name of the product and must appear on the front of the package. The product name should be in bold, largest type, and should provide an accurate description of the product.
2. **Net quantity of contents:** The net quantity of the contents of the container must appear at the bottom portion of the label on the PDP. This is where you declare the product weight in not only U.S. customary units but also using metric system units. For example: "Net Wt. 10.5 OZ. (298 g)". The product can be

described in either weight for solids, (e.g. ounces, grams) or volume for liquids (e.g. fluid ounces or milliliters).

The PDP's size will determine how big the letters can be and the font size that can be used on the package. In most cases, letter size should be no less than 1/16" in height based on the lower case 'o' (HHS, 2013).

Note: If there are two or more sections of the package that could be suitable for the PDP, one surface becomes the Alternate Principle Display Panel (APDP, fig. 1). Think about the front and back of a cereal box.

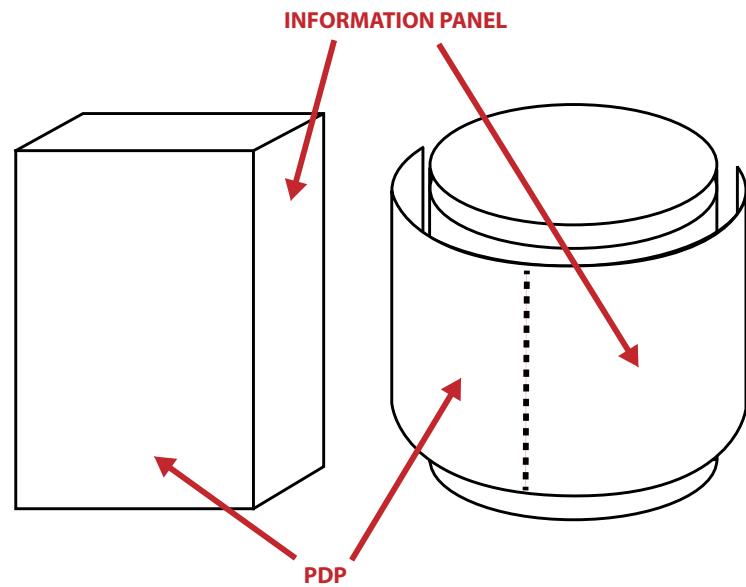


Figure 1. Example of the components of a food label, including the Primary Display Panel, Alternate Principle Display Panel, and Information Panel (HHS, 2013, VCE, 2012).

"This work is supported by Food Safety Outreach Program [grant no. 2016 0020-25888/project accession no. 1010671] from the USDA National Institute of Food and Agriculture"

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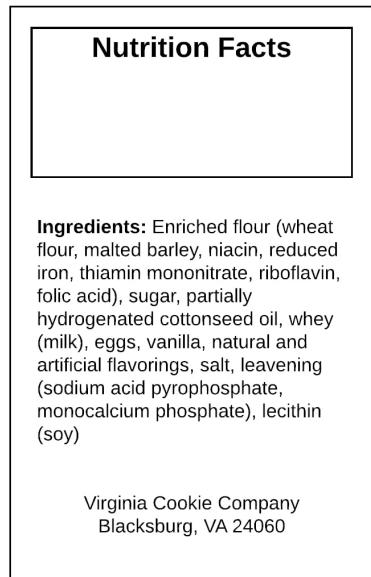


2) Information Panel

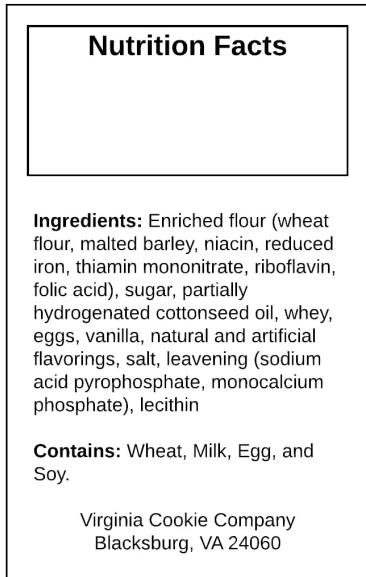
The information panel is directly to the right of the PDP. By regulation, it must contain:

- List of ingredients:** All ingredients must be listed in descending order by weight or volume. In other words, the ingredient that weighs the most is listed first and the ingredient that weighs the least is listed last (HHS, 2013). If an ingredient has multiple components, all components must be listed in parentheses following the ingredient. For example: Mustard (vinegar, water, mustard seed, salt, turmeric, paprika, spices, and garlic powder).

Additionally, the eight major allergens (dairy, eggs, peanuts, seafood, shellfish, tree nuts, soy, and wheat) must also be identified in the ingredients list (figure 2A). These can be included within the ingredient list, or as a separate statement. For example: "This product contains wheat." (figure 2B)



A



B

Figure 2. Examples of ways to display list of ingredients on your package. A) within ingredient list or B) as a separate statement (Figure by Lily Yang, Virginia Tech).



The Virginia Department of Agriculture and Consumer Services has a "Home Kitchen Food Processing Exemption" (VDACS, 2017). If you are selling your product using this exemption, you are still required to have a label displaying the name, physical address, and telephone number of the person preparing the food, including the date the product was processed. The label must also include the statement: "NOT FOR RESALE – PROCESSED AND PREPARED WITHOUT STATE INSPECTION".

- Contact information:** The full name and address (PO Box is not acceptable) of the manufacturer, packer, or distributor of your product must be included. The address must include street number and street name (if not listed in a directory or telephone book), city, state, and ZIP code.
- Nutrition Facts Panel:** This is the portion of the label that breaks down the contents of your product by nutrient and health claims (see fig. 3). Some small businesses may be exempt from having a Nutrition Facts Label. For instance:

- Retailers with less than \$500,000 in gross annual sales of all types of products (food and non-food) are exempt.

What are nutritional labeling panel claims?

Nutritional labeling claims are claims stating, suggesting, or implying that a food or food ingredient has specific nutritional benefits. The FDA has a list of all nutritional claims allowable by law; all claims must follow the FDA's guidance. Some examples of common claims include "low-fat," "sugar-free," and "a good source of ..."

Generally, there are three types of claims: health claims, nutrient content claims, and structure/function claims.

- Health claim:** A claim on a label that directly states or implies that the food product provides some benefit that helps with a disease or health condition.

Note: All health claims approved for use are listed in the labeling guide (HHS, 2013). These must be approved by the FDA who verifies the relationship between the food product and the health condition. Examples include, "A diet low in sodium may [or might] reduce the risk of high blood pressure," and "A diet low in saturated fat and cholesterol may reduce the risk of heart disease."

Nutrition Facts		
Serving Size 1 tray (3 pockets) (143g) Servings Per Container about 5		
Amount Per Serving	% Daily Value*	
Calories 240 Calories from Fat 40		
Total Fat 4.5g 7%		
Saturated Fat 2.5g	12%	
Trans Fat 0g		
Cholesterol 25mg	9%	
Sodium 190mg	8%	
Total Carbohydrate 40g	13%	
Dietary Fiber 4g	15%	
Sugars 9g		
Protein 11g		
Vitamin A 50% • Vitamin C 25%		
Calcium 15%	• Iron 10%	
* 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 65 g	80 g
Saturated Fat	Less than 20 g	25 g
Cholesterol	Less than 300 mg	300 mg
Sodium	Less than 2,400 mg	2,400 mg
Total Carbohydrate	300 g	375 g
Dietary Fiber	25 g	30 g
Calories per gram:		
Fat 9 • Carbohydrate 4 • Protein 4		

Figure 3. Example of a Nutrition Facts Panel. (Photo courtesy of Lily Yang, Virginia Tech.)



Nutrient content, health, or structure/function claims must be accompanied by a Nutrition Facts Panel to prove your claim. Regardless of exemption status, if you want to include a claim on your package, you are required to include a Nutrition Facts Panel.

If you do not include a Nutrition Facts Panel because you are exempt, you cannot make any nutritional labeling claims about the product.

- 2. **Nutrient content claim:** A claim on a label implying a certain level of nutrients is available in the product. Most nutrient claims apply to the amount of nutrient provided by one serving size in relation to a 2,000-calorie intake per day. Examples include “-free,” “reduced,” “lite,” or “high” when referring to a specific level of nutrient (e.g., fat, sugar, vitamin, etc.).
- 3. **Structure/function claims:** A claim on a label that indicates that an ingredient in the product has an effect on a function in the human body, but is not related to a specific disease. For example: “Calcium builds strong bones”.

Additional Resources

Virginia Cooperative Extension. 2012. *Making a Nutrient or Health Claim*. VCE publication FST-54NP. https://pubs.ext.vt.edu/content/dam/pubs_ext_vt_edu/FST/FST-54/FST-54NP_PDF.pdf.

Virginia Department of Agriculture and Consumer Services. n.d. *Basic Labeling Requirements*. www.vdacs.virginia.gov/vafinest.com/pdf/requirements.pdf.

Virginia Department of Agriculture and Consumer Services. 2017. “Labeling Guidelines,” 58-61. *In Handbook for Small Food Manufacturers*. www.vdacs.virginia.gov/pdf/va-food-handbook.pdf.

Reference

U.S. Department of Health and Human Services (HHS). 2013. A food labeling guide: guidance for industry. www.fda.gov/FoodLabelingGuide

Virginia Cooperative Extension. 2012. Know Your Way Around a Food Label. VCE publication FST-53NP. https://pubs.ext.vt.edu/content/dam/pubs_ext_vt_edu/FST/FST-53/FST-53NP_PDF.pdf.