Food Labeling Panel Discussion
## Compliance with FDA’s New Nutrition Facts Label

### GENERAL COMPLIANCE PERIOD

<table>
<thead>
<tr>
<th>Initiative</th>
<th>Final Rule</th>
<th>Requirement</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Revisions of the Nutrition and Supplement Facts Labels*</td>
<td>July 26, 2016</td>
<td>New Label Requirements</td>
<td>January 1, 2020</td>
</tr>
<tr>
<td>Updating, Modifying and Establishing Certain Reference Amounts Customarily Consumed and Requirements for Dual Column Labeling*</td>
<td>July 26, 2016</td>
<td>Additional New Label Requirements</td>
<td>January 1, 2020</td>
</tr>
<tr>
<td>FDA’s determination on Partially Hydrogenated Oils (PHOs)</td>
<td>June 16, 2015</td>
<td>Reformulate products to remove PHOs and/or petition the FDA to permit specific uses</td>
<td>June 18, 2018</td>
</tr>
<tr>
<td>Disclosure of Calorie Information for Food Sold from Vending Machine</td>
<td>December 1, 2014</td>
<td>Ensure appropriate disclosure of calories on vending machine food</td>
<td>July 26, 2018</td>
</tr>
<tr>
<td>Menu Labeling</td>
<td>December 1, 2014</td>
<td>Calorie Disclosure of standard menu items in restaurants and availability of additional nutrition information</td>
<td>May 7, 2018</td>
</tr>
</tbody>
</table>

*Manufacturers with less than $10 million in annual food sales will have an additional year to make the changes.
What’s Different?

- **Servings:** larger, bolder type
- **Calories:** larger type
- Serving Sizes updated
- Updated daily values
- **New:** added sugars
- Actual amounts declared
- Change in nutrients required
- New footnote
RACC Changes

• Reference Amounts Customarily Consumed (RACC)
  – About 19% of the RACC amounts changes
  – Added 25 new categories

• Impacts serving size determination

• Impacts nutrient content and health label claims
Dual Nutrition Format

• For packages containing 200% to 300% of the RACC
  — One column of nutrition for a serving derived from the RACC
  — Second column of nutrition for entire package

• Multi-serving packages with discrete units where each unit is 200% to 300% of the RACC
  — One column of nutrition for a serving derived from the RACC
  — Second column of nutrition for entire unit
# Dual Nutrition Format

<table>
<thead>
<tr>
<th></th>
<th>Per Serving</th>
<th>Per Container</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Calories</strong></td>
<td>220</td>
<td>440</td>
</tr>
<tr>
<td>Total Fat</td>
<td>5g (6%)</td>
<td>10g (13%)</td>
</tr>
<tr>
<td>Saturated Fat</td>
<td>2g (10%)</td>
<td>4g (20%)</td>
</tr>
<tr>
<td>Trans Fat</td>
<td>0g</td>
<td>0g</td>
</tr>
<tr>
<td>Cholesterol</td>
<td>15mg (5%)</td>
<td>30mg (10%)</td>
</tr>
<tr>
<td>Sodium</td>
<td>240mg (10%)</td>
<td>480mg (21%)</td>
</tr>
<tr>
<td>Total Carb.</td>
<td>35g (13%)</td>
<td>70g (25%)</td>
</tr>
<tr>
<td>Dietary Fiber</td>
<td>6g (21%)</td>
<td>12g (43%)</td>
</tr>
<tr>
<td>Total Sugars</td>
<td>7g</td>
<td>14g</td>
</tr>
<tr>
<td>Inc. Added Sugars</td>
<td>4g (8%)</td>
<td>8g (16%)</td>
</tr>
<tr>
<td>Protein</td>
<td>9g (8%)</td>
<td>18g</td>
</tr>
<tr>
<td>Vitamin D</td>
<td>5mcg (25%)</td>
<td>10mcg (50%)</td>
</tr>
<tr>
<td>Calcium</td>
<td>200mg (15%)</td>
<td>400mg (30%)</td>
</tr>
<tr>
<td>Iron</td>
<td>1mg (6%)</td>
<td>2mg (10%)</td>
</tr>
<tr>
<td>Potassium</td>
<td>470mg (10%)</td>
<td>940mg (20%)</td>
</tr>
</tbody>
</table>

*The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.*
Dietary Fiber

- Naturally occurring non-digestible carbohydrates and lignin
- Isolated or synthetic non-digestible carbohydrates that FDA has granted be included and have physiological effects beneficial to human health
Dietary Fiber

- Isolated or synthetic non-digestible carbohydrates approved by FDA
  - Beta-glucan soluble fiber
  - Psyllium husk
  - Cellulose
  - Guar Gum
  - Pectin
  - Locust Bean Gum
  - Hydroxypropylmethylcellulose
Added Sugar

Defined as:
- Sugars (free, mono- and disaccharides)
- Sugars from syrups and honey
- Sugars from concentrated fruit or vegetable juices

- Exemptions:
  - Reconstituted to single strength in the formula
  - Concentrated from 100% and sold to consumers
  - Used toward the total juice percentage or Brix standardization for beverages
  - Used to formulate the fruit component of standardized jellies, jams, or preserves or the fruit component of fruit spreads
Recordkeeping

• Dietary Fiber
  – Manufacturer must make and keep records to verify the declared amount of dietary fiber when a mixture of dietary fiber, and added non-digestible carbohydrates that does not meet the definition of dietary fiber, is present in the food.

• Sugars
  – Manufacturer must make and keep records when a mixture of naturally occurring and added sugars is present in the food
  – Where added sugars are subject to fermentation and/or non-enzymatic browning, records must be kept to verify declared amount of added sugars
Recordkeeping

• Folate
  – Must make and keep records of the amount of folic acid added to the food and the amount of naturally-occurring folate

• Vitamin E
  – Must make and keep records of the amount of all rac-alpha-tocopherol added to the food and the amount of RRR-alpha-tocopherol