

August 1, 2015

Proposed NFP Impact Analysis

Signature Ice Cream – 500g

Acme Ice Cream Co.

This customized report analyzes the major impacts on this label of the FDA's proposed nutrition & serving size rules, expected to become final in 2016. It includes:

1. Executive Summary of Impact
2. Nutrition Facts Panel comparison with:
 - ✓ Current vs. Proposed NFP
 - ✓ Dimension changes
 - ✓ Serving changes, if any
 - ✓ New required nutrients
 - ✓ Nutrient changes (DVs, units & amounts, if any)
2. Proposed NFP Style Guide & formatting tips
3. Nutrient Claims changes with:
 - ✓ New claims eligibility comparison
 - ✓ All acceptable wordings & disclosures, if any
 - ✓ "Build a Claim" Style Guide
4. Recommendations for Next Steps


Prepared by

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Signature Ice Cream – 500g Proposed NFP Impact Analysis

Executive Summary

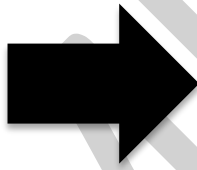
Nutrition Facts Panel Changes	
New NFP Dimensions:	Height increased by 0.38 inches Width increased by 1.31 inches
Serving Size:	Doubled to 1 cup
Servings Per Container:	Cut to 4
3 New Required Nutrients:	Added Sugars amount provided by Acme Vitamin D amount obtained with nutritional analysis Potassium amount estimated by PLC
% Daily Value Changes:	All nutrient daily values have changed due to the change in serving size and new recommended DVs
Comments: The new proposed rules have a significant impact on this NFP due to the changes in Reference Amounts Customarily Consumed (RACC) for Ice Cream and the dual column format requirement.	
Nutrient Content Claim Changes*	
2 new nutrient claims allowed:	High Protein & High Calcium
1 current nutrient claim disallowed:	Low Fat
Comments: Because the RACC change for Ice Cream heavily affected the %DV's, your "Good Protein" and "Good Calcium" claims are now "High Protein" and "High Calcium" claims.	
Strategic Options	
To minimize your large graphics footprint, you may consider...	
To address missing nutrient data, one option is to...	
To address the large calorie impact, you may consider doing x,y,z...	
To minimize Added Sugar impact, one option would be to ...	
To address the new nutrient DV's for fat, you may want to	
Current NFP Checkup	
Graphics:	
Serving Information:	
Required Nutrients:	
Rounding Rules:	Non-compliant
Footnote:	Non-compliant
Comments:	

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Nutrition Facts Panel Comparison

Current NFP

Nutrition Facts	
Serving Size 1/2 cup (66g)	
Servings Per Container about 8	
Amount Per Serving	
Calories 100 Calories from Fat 15	
% Daily Value*	
Total Fat 1.5g	3%
Saturated Fat 1g	6%
<i>Trans Fat</i> 0g	
Cholesterol 125mg	42%
Sodium 55mg	2%
Total Carbohydrate 19g	6%
Dietary Fiber 0g	0%
Sugars 16g	
Protein 5g	11%
Vitamin A 10% • Vitamin C 0%	
Calcium 15% • Iron 0%	
* Percent Daily Values are based on a 2,000 calorie diet.	
	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
Protein	50 g 65 g



Proposed NFP

Nutrition Facts		
about 4 servings per container		
Serving size		1 Cup (133g)
Calories	200	750
	Per 1 Cup	Per Container
	% DV*	% DV*
Total Fat	5% 3g	19% 13g
Saturated Fat	12% 2.5g	45% 9g
<i>Trans Fat</i>	0g	1g
Cholesterol	84% 250mg	315% 940mg
Sodium	5% 115mg	19% 440mg
Total Carbs	13% 39g	49% 160g
Dietary Fiber	2% 1g	8% 4g
Total Sugars	32g	120g
Added Sugars	64% 32g	240% 120g
Protein	22% 11g	82% 40g
Vitamin D	0% 0mcg	5% 1mcg
Calcium	15% 200mg	50% 740mg
Iron	0% 0mg	6% 1mg
Potassium	10% 470mg	34% 1760mg

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

NFP Dimension Changes

Height: 4.12 inches
Width: 1.60 inches

4.50 inches
2.91 inches

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Proposed NFP Style Guide

Nutrition Facts			
about 4 servings per container			
Serving size		1 Cup (133g)	
	Per 1 Cup	Per Container	
Calories	200	750	
	% DV*	% DV*	
Total Fat	5% 3g	19% 13g	
Saturated Fat	12% 2.5g	45% 9g	
Trans Fat	0g	1g	
Cholesterol	84% 250mg	315% 940mg	
Sodium	5% 115mg	19% 440mg	
Total Carbs	13% 39g	49% 160g	
Dietary Fiber	2% 1g	8% 4g	
Total Sugars	32g	120g	
Added Sugars	64% 32g	240% 120g	
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Calcium	15% 200mg	50% 740mg	
Iron	0% 0mg	6% 1mg	
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Proposed NFP Graphic Specifications:

21 CFR 101.9(d),(e),(f) and (j)(5), and Appendices A-H to 21 CFR Part 101

1. Enclose the panel in a box with hairline rules (1/2 pt suggested*). Suggested distance from text is 3 pts.* On the split format, add a vertical rule between the two sections.
2. Do not kern type tighter than a -4 setting (letters may not touch).
3. Etcetera...

Tips for modifying the proposed NFP graphics:

1. The proposed rule specifies one font type with three states: regular, bold and extra bold. PLC uses Arial (most common NFP font), but there are not too many commercially available fonts with three states. If you prefer not to use Arial, you may
2. Etcetera...

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Nutrient Claims Eligibility Comparison

New Allowed Nutrient Content Claims
<ul style="list-style-type: none">▪ High Protein▪ High Calcium
Disallowed Nutrient Content Claims
<ul style="list-style-type: none">▪ Low Fat
Unchanged Nutrient Content Claim Eligibility
<ul style="list-style-type: none">▪ Low Sodium▪ Good Protein▪ Good Calcium

*** The proposed rule would affect which nutrients on the Nutrition Facts Panel must be declared:**

- Vitamin A and Vitamin C would no longer be mandatory to declare; if a claim is made about either nutrient however it would need to be listed on the Nutrition Facts Panel
- Potassium and Vitamin D would now become mandatory to declare on the updated Nutrition Facts Panel

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Build a Sample Claim for

Signature Ice Cream – 500g

(designed for this product only)

Step 1: Choose a compliant wording:
<ol style="list-style-type: none"> 1. Wording one 2. Wording two 3. Wording three 4. Wording four 5. Wording five
Step 2: Format claim
<ol style="list-style-type: none"> 1. PLACEMENT: specifics... 2. PROMINENCE: specifics...
Step 3: Add required disclosure statement
Required disclosure statement
Step 4: Format disclosure statement
<ol style="list-style-type: none"> 1. PLACEMENT: specifics... 2. PROMINENCE: specifics...
Additional Information:
<p>21 CFR 101.13(e)(1) Only foods that have been specially processed, altered, formulated, or reformulated so as to lower the amount of nutrient in the food, remove the nutrient from the food, or not include the nutrient in the food may bear such a low nutrient claim (e.g., "low sodium potato chips").</p> <p>If a similar food would normally be expected to contain a nutrient, such as sodium in canned peas, and the labeled food is made in such a manner that it has little or none of the nutrient, then the food is considered specially processed and may bear a "free" or a "low" claim.</p>

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Recommendations for Next Steps

1. Recommendation One
 - a. Suggestion One
 - b. Suggestion Two
2. Recommendation Two
 - a. Suggestion One
 - b. Suggestion Two

Thank You

Return this coupon after the Final Rule is published for a
FREE NFP revision, compliant with updated formatting*

** Data changes will incur additional charges.*

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