

Course in Nutrition Labeling

Sixth Edition

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A self-paced course of study
in required and optional nutrition labeling
for food products under FDA and USDA regulation.



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INTRODUCTION

Perspective

Only a few hundred years ago, most of the inhabitants of what we now call the United States of America defined “eating well” as having enough to eat. Food choices were limited, and so was nutrition education: each generation taught the next which foods to consume, and how to either find or raise them. Almost everyone shared responsibility for making sure that there was enough food to go around.

Today, only a fraction of the American population is responsible for making sure that there is enough food to fill everyone’s belly. Knowledgeable Americans increasingly define “eating well” as getting the right balance of energy and nutrients to promote optimal health – a process that involves not only getting enough of certain nutrients, but also avoiding excesses of other nutrients. They value the luxury of being able to make their own choices from a dazzling array of food products. And so, their concern has shifted from “how do you get enough?” to “how do you recognize the right stuff?”

The answer? In part, Federally mandated nutrition labeling.

Where this manual comes in

If you are a food manufacturer or retailer operating under U.S. Food and Drug Administration (FDA) or Department of Agriculture (USDA) regulations, you need to understand the Federal nutrition labeling regulations.

Hence this self-paced course. The following chapters...

- give you background on Federal nutrition labeling regulations and the agencies responsible for enforcing them,
- help you determine the need for nutrition labeling on your food products, and
- offer step-by-step instruction in how to create complete, accurate nutrition labeling.

The emphasis is on the practical details of creating nutrition labeling, including the Nutrition Facts Panel (NFP), that complies with all Federal guidelines. This manual doesn’t simply restate the published regulations; instead, it takes the most important details and concepts and presents them in a logical sequence, along with practical hints that come from years of experience creating real nutrition labeling for real products. For most or all your products, you won’t need to consult any other sources. However, this manual does not address every minor detail or contingency covered in the nutrition labeling regulations; so, if you need additional information on specific topics, consult the sources cited throughout the text.¹

The FDA and USDA have historically had very similar nutrition labeling requirements for food products. With the update to Nutrition labeling finalized by FDA in early 2016, differences with the 1993 USDA

¹ All sources cited may be obtained from the Government Printing Office in Washington, DC or accessed via the Internet. For USDA-regulated products, there are sometimes two citations from 9 CFR, while for non-meat products, there is only one citation from 21 CFR. Meat and poultry products are regulated under authority of two different Federal acts; therefore, the regulations applying to them sometimes appear in different sections of 9 CFR. Anticipating the finalizing of revised USDA Nutrition Labeling regulations, the citations in this manual to USDA Nutrition Labeling regulations refer to paragraphs in the new part 9 CFR 413. If you wish to look up these regulations using the old citations, do the following:

- for meat regulations, simply replace “413” with “317”
- for poultry regulations, replace “413” with “381” and increase the number after the decimal point by 100.

For example, 9 CFR 413.309(d)(1) equates back to 9 CFR 317.309(d)(1) and 9 CFR 381.409(d)(1).

Nutrition labeling regulations were more pronounced. However, prior to a final regulation modifying USDA Nutrition labeling, USDA has permitted Nutrition Facts panels appearing on USDA amenable products to be constructed following the 2016 FDA regulations. This volume reflects the 2016 FDA regulations, making note where appropriate of any special considerations for USDA amenable products.

This volume is designed to serve as a concise reference as well as a self-study course. Therefore, most examples of actual products are located in worksheets at the end of the manual, instead of sprinkled throughout the text. Each worksheet challenges you to apply the principles discussed to “real” products. Applying the rules is the only way we know to really understand them – so please take the time necessary to complete the worksheets, and do not consult the answer keys unless you have answered the questions or get stuck.

Many of you may be picking up this manual in response to the 2016 update to FDA Nutrition labeling. While many of the features of the Nutrition Facts panel have been impacted, the core structure of nutrition labeling remains in place. This volume reflects the 2016 FDA regulations, including voluntarily using Nutrition Facts panels created under the FDA regulations on USDA amenable products.

How this manual is organized

The text is divided into fourteen chapters/modules. **Chapters I through XI** provide background on nutrition labeling and take you step-by-step through the creation of the Nutrition Facts panel. **Chapters XII and XIII** cover nutrition claims, statements that are always optional but can do much to enhance product appeal. At the end of this manual, there are **worksheets** and its corresponding **answer key** covering key concepts explained in each chapter. After the last chapter, a **Conclusion** wraps things up and gives you a well-deserved pat on the back.

A **Glossary** of important nutrition labeling terms used in this manual comes next. Behind it are several **Appendices**, providing more tools for nutrition labeling and additional information on key points raised in the text.

How to get started

You do not need any labeling or nutrition background to complete this course. You don't need any other references, either (although you might want to look at certain sections of the Federal regulations cited in the text – that's up to you). All you need is curiosity, a calculator, a pen or pencil, and a scratch pad. And, of course, some time when you won't be interrupted and can concentrate.

Appendix A contains sample worksheets that can be used to create and keep records of your nutrition labeling. If you want to work on one of your own products while going through the manual, copy these worksheets and write your answers on the copies.

If you are using the printed form of this manual, we encourage you to copy the worksheets at the back for each chapter, too. Write your answers on the copies. That way, future users of the manual won't be influenced by your responses.

Take a few moments to get your supplies together and, next time you can carve out some “quiet time,” move on to Chapter I.