




EXPORT IN DIE USA **LEBENSMITTEL &** **GETRAENKE**

- **AUSSENWIRTSCHAFTSSEMINAR 2024**
- **4. JUNI 2024**



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FREQUENT
LABELING
PROBLEMS

... AND
SOLUTIONS !



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FDA LABELING REQUIREMENTS

Principal Display Panel (PDP)

- Name of the product
- Product description *IN ENGLISH!*
- Net weight in lower 30% of label -- “Net Wt” und “Net”

FDA **INFORMATION PANEL**

Immediately to right of PDP:

- Nutrition Facts
- Ingredient list
- Name of Manufacturer, Importer – Contact Info
- Country of Origin

NEW LABEL / WHAT'S DIFFERENT

Servings:
larger,
bolder type

Nutrition Facts

8 servings per container
Serving size 2/3 cup (55g)

Amount per serving
Calories 230

% Daily Value*

Total Fat 8g 10%
Saturated Fat 1g 5%
Trans Fat 0g

Cholesterol 0mg 0%
Sodium 160mg 7%

Total Carbohydrate 37g 13%
Dietary Fiber 4g 14%

Total Sugars 12g
Includes 10g Added Sugars 20%

Protein 3g

Vitamin D 2mcg 10%
Calcium 260mg 20%
Iron 8mg 45%
Potassium 235mg 6%

* 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.

Serving sizes
updated

Calories:
larger type

Updated
daily
values

Actual
amounts
declared

New
footnote

New:
added sugars

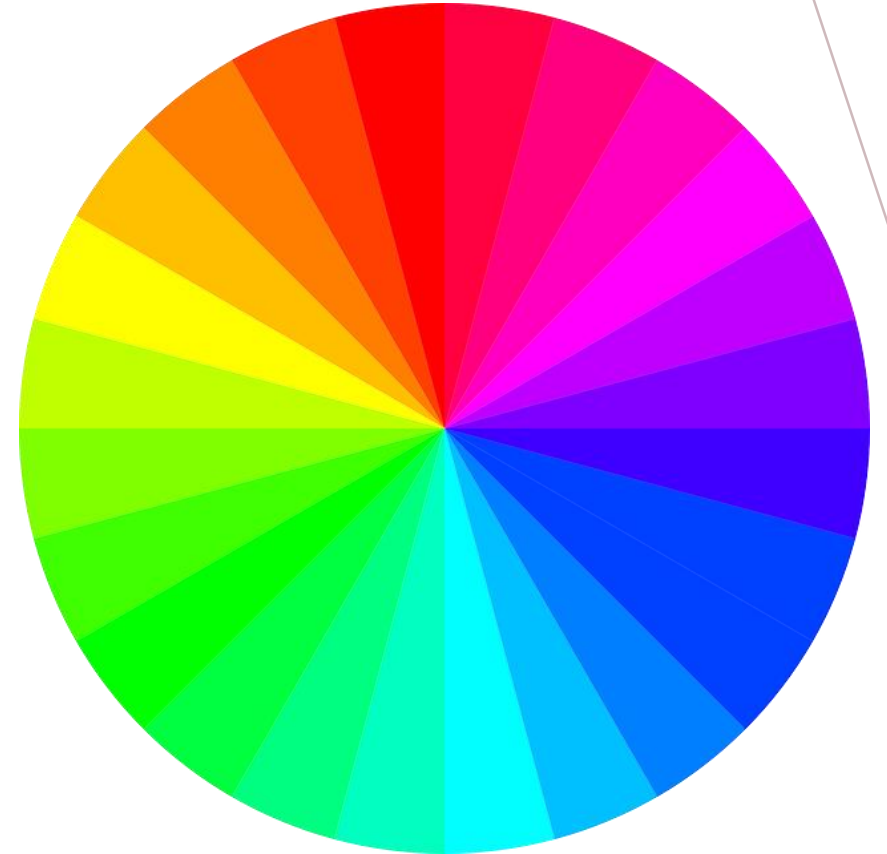
Change
in nutrients
required

COLORS

Differences in colors between the EU and the US for example

E 110 – is known as “Sunset Yellow FCF” or “Orange Yellow S”. However, this color is only permitted as FD&C Yellow #6

E 104 – “Quinoline Yellow” – is only permitted in Drugs and Cosmetics but not in Foods in the US. Its use is allowed in other countries





COLORS



“**Safflower**” – is ***not permitted*** for use as a color additive in foods in US.

“**Curcumin**” – is only permitted if it is declared as “turmeric”

Added Colors *NEVER* Natural!!!

COLORS...

- Differences in what is permitted in US and/or how they are named, e.g.
 - **Forbidden:**
 - Safflower
 - Lutein
 - E104 – Quinoline Yellow – only for cosmetics and pharmaceuticals
 - **Certified Colors:**
 - “FD&C” colors such as Yellow #5, Blue #1, Green #3
 - **Exempt from Certification, e.g.:**
 - Most Fruits & Vegetables
 - Spirulina Extract
 - Cochineal Extract, Carmine

INGREDIENTS

Ingredient No-no's, e.g.:

- No “E-Numbers”
- No “cocoa mass”
- Not declaring the source of a fat or oil used
- Not breaking out a multi-component ingredient
- Not breaking out a standardized food (such as preserves, chocolate, etc.)
- No “Export Packages”



Major Food Allergens:

- Milk
- Egg
- Fish
- Crustacean Shellfish
- Tree Nuts (Coconut)
- Wheat
- Peanuts
- Soybeans

★ Sesame 1-1-2023

Allergen Differences..

- **In EU :**
 - Mustard
 - Rye, Barley, Oats
 - Celery
 - Gluten
- **In US :**
 - “Gluten” considered a “minor” allergen in US and covered by Wheat
 - Coconut as tree nut
 - Molluscan Fish NOT Allergen (oyster, clam, mussels, scallops)

Contact Information

- Immediately after Ingredients / Allergens:
 - Contact information – if Foreign Company, add Country after Postal Code and City
 - Not necessary to declare Importer and Manufacturer
 - Address is assumed to be manufacturer, if not, function must be included:
imported by, manufactured for, distributed by..... – FDA
 - Country of Origin should appear above or below contact information – US Customs Requirement
- *Type size requirements for all declarations!!*

Other Label Declarations

- If insufficient room on back (information) label, Nutrition Facts can be moved to another label.
- Ingredients, Allergen, Contact, Country of Origin must stay together
- Preparation instructions, if applicable, should appear somewhere else on label (or above ingredients if Nutrition Facts moved)
- *Best Before, UPC and Storage Information* are all **NOT** required by the FDA and may not interfere with the above mandatory requirements
- If adding Net Wt to back label, it is recommended to be last information on bottom



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