

The purpose of the document is to assist food purveyors in creating compliant food packaging labels. Contact information for the Montana wholesale food program is on page four of this document.

Creating a compliant label can be easy. Only four questions need to be answered for most food package labels:

Question	Label location
<b>What is it?</b>	Principal Display Panel
<b>How much is in it?</b>	Principal Display Panel
<b>What is in it?</b>	Information Panel
<b>Who makes it?</b>	Information Panel

**PRINCIPAL DISPLAY PANEL**

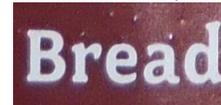


The Principal Display Panel is the area of the package most likely to be seen by consumers at the point of purchase.

**Items to include on the Principal Display Panel:**

1. Name of the food, also called the Statement of Identity
2. Net quantity or amount of product

**NAME OF FOOD (What is it?)**



The name of the food is also known as the Statement of Identity.

**Items to include on the Statement of Identity:**

1. The common or usual name of the food must be used that is most likely understood by the consumer. This generally means only the English language
2. The name of the food must be in bold type

**NET QUANTITY (How much is in it?)**



The net quantity or amount of product must be on the Principal Display Panel.

**Items to include on the net quantity statement:**

1. Express units in terms of weight, measure or numerical count
2. Solid weight must be in pounds and ounces, if greater than 16 ounces OR only ounces, if 16 ounces or less
3. Liquid measure must be fluid ounces
4. Metric units for solid and liquid weights must be expressed (solids in grams (g) and liquids in milliliters (mL))
5. Net quantity must be on bottom 30 percent of Principal Display Panel
6. **For solids:** The term "Net Wt." or an acceptable variant must precede the quantity units for solids (e.g. *Net Wt. 12 oz*)
7. **For liquids:** The term "fluid oz" or an acceptable variant must succeed the quantity units for liquids (e.g. *20 fluid oz*)
8. Minimum type-size is 1/16 inch in height for Principal Display Panels that have an area of 5 square inches or less; 1/8 inch for PDPs greater than 5 square inches and at or less than 25 square inches. Other dimensions also apply.

## INFORMATION PANEL

For smaller firms, the Information Panel answers only two questions: what is in the food and who makes or is responsible for the food. For larger firms, the information panel must also include nutritional information.



### INGREDIENTS LIST (What is in it?)



The ingredients are the food substances that comprise the product.

#### Items to include on the ingredients list:

1. Common or usual name of the ingredient. This generally means the English language must be used.
2. Each ingredient must possess weight (i.e. be quantifiably measurable)
3. Claims of quality must not be on the ingredients list, since it is not quantifiably measurable (i.e. organic, healthy, etc.)
4. Ingredients must be listed in order of predominance by weight from greatest to least amount
5. Minimum type-size is 1/16 inch in height, based on the lower-case letter "o"
6. No other information is allowed on the ingredients list other than that which is required
7. The ingredients list must be to the right of the Principal Display Panel, if the package is not a single-panel label
8. If the ingredient is less than 2 percent of total product weight, the ingredient should be listed at the end with a statement that reads: "contains 2% or less of \_\_\_\_\_"
9. Major allergens must be declared or product will be recalled

**Major allergens are: crustacean shellfish (crab, lobster, shrimp, etc.), eggs, fish, milk, peanuts, soy, tree nuts and wheat**

10. Sub-ingredients for ingredients must be listed in parentheses immediately after the listed ingredient (see below)

### SUB-INGREDIENTS

VEGETABLE OIL (CANOLA AND/OR SOY),

Sub-ingredients are ingredients within ingredients that must be declared on the list. Examples of ingredients that have sub-ingredients are mayonnaise, blended oils, cheeses, etc.

#### Items to include on the sub-ingredients list, if needed:

1. Declare sub-ingredients within parentheses immediately after the listed ingredient (e.g. *Mayonnaise (soybean oil, water, whole eggs, vinegar, salt, sugar, lemon juice, natural flavors)*)
2. If flavors are declared by a standardized name, each sub-ingredient must be listed (e.g. *vanilla extract (vanilla bean extractives in water and alcohol (41%))*)
3. All applicable rules for ingredients also apply to sub-ingredients

## INFORMATION PANEL



### RESPONSIBLE FIRM (Who makes it?)

STATES BAKERY, PORTLAND, OR 97232

The firm responsible for the product is the manufacturer, packer or distributor of the food. This information is needed for the consumer, if they plan to contact the firm.

#### Items to include when declaring a responsible firm:

1. Name and address of the manufacturer, packer or distributor
2. Unless the name listed is the actual manufacturer, the responsible firm must be accompanied by a qualifying phrase that states the firm's relation to the product (e.g., "Manufactured for" or "Distributed by")
3. Street address, if the firm name and current address are not listed in a:
  - a) Current city directory; **OR**
  - b) Current telephone book
4. City or town
5. State (or country of origin, if outside the United States)
6. United States Postal Service ZIP code (or mailing code used in countries other than the United States)
7. Responsible firm information must be with the ingredients list
8. No other information is allowed with the responsible firm other than that which is required

### NUTRITION LABELING (for larger firms)

Nutrition Facts		Amount/Serving	%DV*	Amount/Serving	%DV*
Serving Size 1 Slice (32g)		Total Fat 1g	2%	Sodium 150mg	6%
Servings Per Container: 21		Saturated Fat 0g	0%	Total Carbohydrate 15g	5%
Calories 80		Trans Fat 0g		Dietary Fiber 2g	8%
Calories From Fat 10		Polyunsaturated Fat 0.5g		Sugars 1g	
Vitamin A 0%		Monounsaturated Fat 0g		Protein 3g	
Thiamin 8%		Cholesterol 0mg	0%		
		Vitamin C 0%			
		Calcium 2%			
		Riboflavin 2%			
		Niacin 6%			
		Iron 4%			
		Folate 2%			

\*Percent Daily Values (DV) are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

Nutrients	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Saturated Fat	Less than	25g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

Calories per gram:  
Fat 9 • Carbohydrate 4 • Protein 4

Firms whose total gross sales for all products—food and non-food—is \$501,000 or less with \$49,000 or less from food sales are exempt from nutrition labeling requirements.

#### Items to include when listing nutrition facts:

1. No other information is allowed with the nutrition labeling other than that which is required
2. Placement of nutrition labeling is to the right of the Principal Display Panel
3. Nutrition Facts label is boxed with all black or one color type printed on white or neutral background
4. Type size and style is specific (see graphic on next page for format example)

## INFORMATION PANEL

Annotations for the Nutrition Facts label:

- Helvetica Regular 8 point with 1 point of leading
- Franklin Gothic Heavy or Helvetica Black, flush left & flush right, no smaller than 13 point
- 3 point rule
- 7 point rule
- 8 point Helvetica Black with 4 points of leading
- 6 point Helvetica Black
- 1/4 point rule centered between nutrients (2 points leading above and 2 points below)
- All labels enclosed by 1/2 point box rule within 3 points of text measure
- 8 point Helvetica Regular with 4 points of leading
- 1/4 point rule
- 8 point Helvetica Regular, 4 points of leading with 10 point bullets.
- Type below vitamins and minerals (footnotes) is 6 point with 1 point of leading

## PRODUCT CODES



All food manufacturers are strongly urged to place production codes on products in the event of a recall. Failure to assign production codes may result in having to recall all products, rather than specific ones of interest.

## OTHER LABELING RESOURCES

Please visit the United States Food and Drug Administration (FDA) web address for more labeling information:  
<https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-food-labeling-guide>

A FREE on-line labeling course is also available. The course requires registration to access:  
<https://www.fda.gov/industry/structured-product-labeling-resources/spl-standard-training>

For products that require federal nutrition labeling, computer software is available to assist in creating compliant labels at the following webpage address: <https://www.nal.usda.gov/fnic/software>

In addition, nutrition labeling and other compliance assistance is also available from:  
 Mission Mountain Food Enterprise Center:  
 Telephone: 406-676-5901  
 Web: <https://lakecountycdc.org/mission-mountain-food-enterprise-center/>

## FOOD LABELING CHECKLIST

	<b>Product name</b> (known as the statement of identity or name of food)
	<b>Name and address of product manufacturer</b> , distributor or packer
	<b>Ingredient list</b> in order of quantity or predominance from greatest to least by weight
	<b>Net weight</b> or liquid volume of product in United States units of measure AND metric units of measure

### CONTACT INFORMATION

<b>Montana Wholesale Food Program</b> P.O. Box 202951 1400 Broadway Street, C-214 Helena, MT 59620-2951	<b>Telephone: 406.444.2837</b> <b>Fax: 406.444.5055</b> <b>E-mail: <a href="mailto:hhsfcs@mt.gov">hhsfcs@mt.gov</a></b> <b>Web: <a href="http://www.dphhs.mt.gov/publichealth/fcs/wholesalefood.shtml">http://www.dphhs.mt.gov/publichealth/fcs/wholesalefood.shtml</a></b>
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Food package labeling regulations are in Administrative Rules Montana (ARM) 37.110.101 (1)(j)/21 CFR 101.