



Guidelines to Changes Nutrition Facts Labels, 2020

On May 26, 2016, the Federal Drug Administration amended its Nutrition Fact Labels to keep up to date with current data on the association between nutrients and chronic disease in the United States and customer consumption patterns (FDA-2012-N-1210-0875). Three major changes will occur: a new design, updates on nutrition science, and realistic sizing of servings. **Below are the dates on which companies must comply with federally mandated changes to the nutrition facts label:**

- **On January 1, 2020 producers with over \$10 million in annual food sales**
- **On January 1, 2021, producers with less than \$10 million in annual food sales**

As a service to our members, the COOC has prepared the following reference guide to assist in mitigating this transition. In this packet, you'll find:

- An overview of the stylistic changes
- Servings per container size table to assist with new calculations of Daily Nutrition Values
- FAQs about nutrient labeling
- Instructions for acquiring new required documents via Eurofins, a COOC member lab

As before, the Nutrition Facts should be presented as part of the Information Panel¹. The Information Panel should be immediately contiguous and to the right of the Principal Display Panel (PDP)² as observed by an individual facing the principal display panel.

For more information about the new nutrition label regulations, check out the Federal Drug and Administration (FDA)'s '[Changes to the Nutrition Facts Label](#).³'

Special thanks to Mary Mori (California Olive Ranch), Lilliana Scarafia (Agbiolab) and Eurofins for sharing their time and expertise on this project.

¹ This refers to the label statements that are generally required to be placed together, without any intervening material, on the information panel, if such labeling does not appear on the PDP. These label statements include the name and address of the manufacturer, packer or distributor, milling facility, the ingredient list, nutrition labeling and any required allergy labeling.

² The PDP is that portion of the package label that is most likely to be seen by the consumer at the time of purchase. The Principle Display Panel should also include net quantity in metric and customary units at the bottom 30% of the label in bold face print.

³ <https://www.fda.gov/food/food-labeling-nutrition/changes-nutrition-facts-label>



Overview of Stylistic Changes

Old Version

Nutrition Facts	
Serving Size 15ml Servings Per Container 33	
Amount Per Serving	
Calories 120	Calories From Fat 120
% Daily Value *	
Total Fat 14g	21%
Saturated Fat 2g	4%
Trans Fat 0g	0%
Cholesterol 0mg	0%
Sodium 0mg	0%
Total Carbohydrates 0g	0%
Dietary Fiber 0g	0%
Soluble Fiber	
Sugars 0g	0%
Protein 0g	0%
Vitamin A 0%	Vitamin C 0%
Calcium 0%	Iron 0%
Thiamin 0%	Riboflavin 0%
Niacin 0%	Vitamin B6 0%
Phosphorus 0%	Zinc 0%
* Percent Daily values are based on a diet of 2,000 calories a day. Your daily values may be higher or lower depending on your calorie needs.	
	Calories: 2,000 2,800
Total Fat	Less than 50g 30g
Saturated Fat	Less than 20g 20g
Cholesterol	Less than 300mg 300mg
Sodium	Less than 2,400mg 2,400mg
Total Carbohydrate	30g 35g
Dietary Fiber	20g 30g

New Version

Nutrition Facts	
33 servings per container	
Serving size 1 tbsp. (15 mL)	
Amount per serving	
Calories 130	
% Daily Value*	
Total Fat 14g	18%
Saturated Fat 2g	10%
Trans Fat 0g	
Polyunsaturated Fat 1.5g	
Monounsaturated Fat 11g	
Cholesterol 0mg	0%
Sodium 0mg	0%
Total Carbohydrate 0g	0%
Dietary Fiber 0g	0%
Total Sugars 0g	
Includes 0g Added Sugars	0%
Protein 0g	
Vitamin D 0mcg	0%
Calcium 0mg	0%
Iron 0mg	0%
Potassium 0mg	0%
*The % Daily Value 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.	
Calories per gram:	
Fat 9 • Carbohydrate 4 • Protein 4	

Format:

- Increased font size for “Calories,” “Servings Per Container,” and “Serving Size.”
- Daily Values have been reduced to a foot note; however, producers must declare the actual amount and Daily Value of vitamin D, calcium, iron, potassium, and added sugars.

Contents:

- Serving sizes have changed to reflect the amount that people actually eat.
- Dietary fiber has an updated definition and must be declared based on the new definition
- New daily value calculations⁴
- “Calories from Fat” has been removed, but “Total Fat,” “Saturated Fat,” and “Trans Fat” remain. Polyunsaturated fat and Monounsaturated fat are both optional but, must include both if you want to include one.

Regulatory:

- New mandate that you have to have proof of your nutrition facts from a third-party lab or software.⁵ You must also have validation tests for any health claim. Note: Proper supporting evidence is required with any health claims included on the label.
- For added sugars, there is no analytical test method that can differentiate natural vs added sugars in a product. Any added sugar must be declared by the manufacturer and be able to provide records to substantiate the value.

⁴ For more information visit: [Industry Resources on the Changes to the Nutrition Facts Label.](https://www.fda.gov/food/food-labeling-nutrition/industry-resources-changes-nutrition-facts-label)
(<https://www.fda.gov/food/food-labeling-nutrition/industry-resources-changes-nutrition-facts-label>)

⁵ Please find a price quote and further instructions for attaining this, Eurofins on page 4 of this document.



Servings Per Container

One of the changes included a shift in the calculations used to generate serving sizes. Below is a template document for your use which lists the appropriate servings per container based upon this new equation.

Container Size	Net Weight	Servings Per Container	Serving Size
100 mL	100mL (3.4 Fl. Oz)	6	1 tbsp (15mL)
250 mL	250 mL (8.5 Fl. Oz)	17	1 tbsp (15mL)
500 mL	500 mL (16.9 Fl. Oz)	33	1 tbsp (15mL)
750 mL	750 mL (25.4 Fl. Oz)	50	1 tbsp (15mL)
1L	1L (33.8 Fl. Oz)	66	1 tbsp (15mL)
3L	3L (101.4 Fl. Oz)	200	1 tbsp (15mL)
1 Gal	3.79L (128 Fl. Oz)	252	1 tbsp (15mL)



To assist with these changes, the COOC is working with Eurofins, a world leader in food product laboratory testing, to make the transition as easy as possible for you. Eurofins has provided a quote for which they will provide an updated nutrition label for COOC members for a discounted rate of \$200.00.⁶ For \$200.00, members with previously conducted analytical data can receive a photo ready nutrition facts panel and documentation. Alternatively, Eurofins may prepare the nutrition facts panel using “average” values derived from a database.¹ This service would require the manufacturer to provide Eurofins with a full product formulation.⁷

Full-service nutritional testing, labeling and documentation packages are also available through Eurofins. For testing and labeling services an alternative quotation and subsequent pricing will be provided. To receive a quote that includes testing, please contact Eurofins Nutritional Analysis Center (contact details provided below).

To begin the process of working with Eurofins:

1. Contact Cortney Miller at cortneymiller@eurofinsus.com or (515) 265-1461 to set up an account.
2. Reference quote number **OU3WUS200037-01**
3. Submit producer information (product formulation or previously obtained analytical data)
4. The label and documentation will be emailed to you directly by a member of the Eurofins team in 5-7 business days.

For \$200.00, members may opt to use average values or provide previously conducted analytical data to receive a photo ready nutrition facts panel and documentation.

Full-service nutritional testing, labeling and documentation packages are also available. For testing and labeling services an alternative quotation and subsequent pricing will be provided. To receive a quote that includes testing please contact Eurofins Nutritional Analysis Center.



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(515) 265-1461
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Tim Heagy
Olive Oil Testing
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⁶ The quote of \$200.00 is to prepare nutrition facts for olive oil. Nutrition Facts for other products or recipes containing olive oil would incur an additional fee.

⁷ **Note:** FDA has not stated how a company should determine the nutrient content of their product for labeling purposes. Therefore, there is no prohibition from using “average” values for its product derived from data bases if a manufacturer is confident that the values obtained meet FDA's compliance criteria. Regardless of its source, a company is responsible for the accuracy and the compliance of the information presented on the label. If differences are noted should the FDA perform their own sampling and testing of Nutrition Values, a producer would need to be able to defend their nutrient values. More information may be found in [The Food Labeling Guide](#).