



Food Labeling Guidelines

Purpose of Food Labeling

The purpose of food labeling is to provide consumers with accurate and relevant information about the products they eat. Labels help consumers compare different products, offer guidance on proper storage and handling, list ingredients to support dietary needs or preferences, and identify the manufacturer in the event of product issues or recalls.

Certain information is required on all food labels, such as the name and address of the responsible firm, any food allergens, and a full ingredient list. Other information, like nutrient content claims (i.e., "low fat") and health claims (i.e., "oatmeal helps reduce cholesterol"), are optional but must comply with federal regulations if included.

Label Panels

Food packages typically feature at least two main label areas: the Principal Display Panel (PDP) and the Information Panel (IP).



The **PDP** is the portion of the label most visible to consumers, often located on the front of the package where it can be easily seen on store shelves.



The **IP** is generally found directly to the right of the PDP, although it may be on the left, rear, top, or bottom of the package if space is limited.

All mandatory label information must be clearly legible.

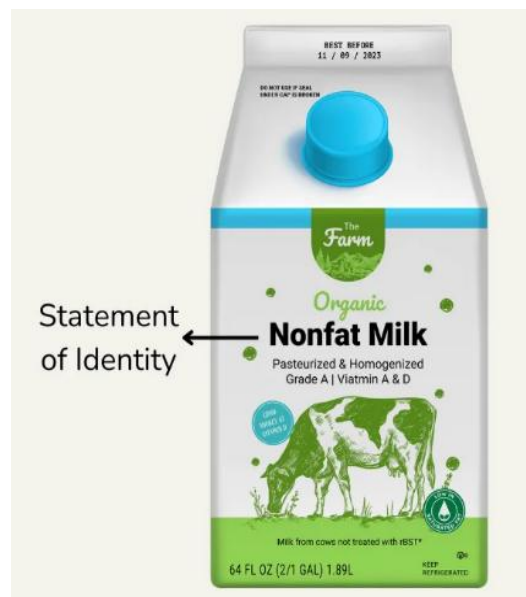
- Unless otherwise specified, the text must be printed in letters at least 1/16-inch in height.
- Exceptions apply to small, single-serving packages, as outlined in federal regulation ([21 CFR §101.2](#)).
- All required details must be presented in English, although accurate translations in other languages may also be included.



Name of Food (Statement of Identity)

Every food product must have a common or usual name in English that accurately describes the item.

- Brand names and trademarks alone do not meet this requirement unless they clearly identify the product.
- This name must appear on the PDP and should truthfully reflect the product's geographical origin if such an origin is suggested by the name or any other label elements.
 - For example, terms like "Hawai'i," "Hawaiian," place names such as Maui or Kona, or culturally associated names like "mahi-mahi" must accurately represent the product's origin.
 - The Hawai'i State Department of Agriculture and Biosecurity's Quality Assurance Division also regulates labels of certain agricultural products, like coffee, to ensure that terms like "Hawai'i grown" are accurate.
- The type size of the product must be reasonably related to the most prominent printed matter on the front panel. Generally, this is defined as at least 1/2 the size of the largest print on the label.



Net Quantity

The net contents statement provides an accurate measurement of the product's net weight or volume.

- The statement must appear in the lower 30% of the PDP and be printed in lines generally parallel to the base of the package.
- The minimum type size for this statement is based on the total area of the PDP and is determined by the height of the lowercase letters.
- For packages that contain one pound or one pint up to but not including four pounds or one gallon, the net contents must be listed using a dual declaration, showing both customary and metric units. Examples include:
 - *NET WT. 18 oz. (1 lb 2 oz) (504 g)*
 - *NET 32 fl. oz. (1 quart) (960 ml)*
- The net contents must always be stated in both metric units and inch-pound (avoirdupois) units. Either measurement system may be used as the primary format on the label.

AREA OF PDP	MINIMUM TYPE SIZE
0-5 square inches	1/16-inch type
5-25	1/8-inch
25-100	3/16-inch
100-400	1/4-inch
More than 400	1/2-inch



Ingredient List

All packaged foods that contain two or more ingredients must include an ingredient list.

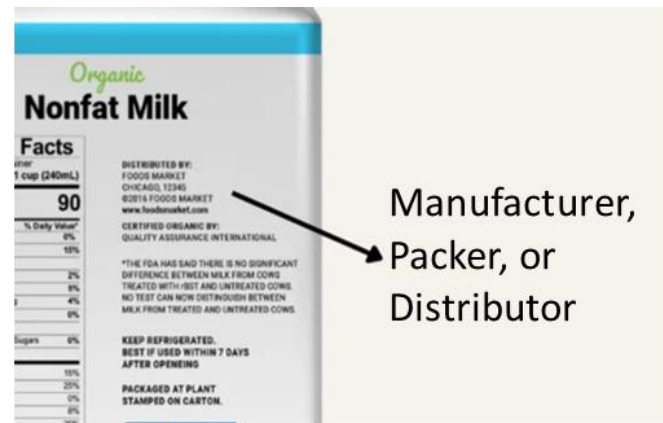


- This list must be clearly legible and arranged in descending order by weight, with the heaviest ingredients listed first.
- Each ingredient should be identified by its common or usual name – for example, “sugar” instead of “sucrose.”
- If an ingredient is made up of multiple components, its sub-ingredients should be listed in parentheses following the main ingredient name.
 - For example: “*Enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, and folic acid), sugar,...*”

Responsible Firm

Each food package must include a responsibility statement that provides the name and address of the manufacturer, packer, or distributor.

- The address must include the street, city, state, and ZIP code, unless the firm's street address is listed in the current telephone directory – in that case, the street name may be omitted.
- This statement can appear on either the PDP or IP.
- If the responsible firm is not the manufacturer, a qualifying phrase such as "Packed For" or "Distributed By" must be used to clarify the firm's role.
- While post office boxes, telephone numbers and email addresses may be added voluntarily to help consumers contact the company, they cannot replace the name and full physical address of the responsible firm.



Nutrition Facts

Under the [Nutrition Labeling and Education Act \(NLEA\) of 1990](#), most packaged foods are required to display nutrition facts on their labels. However, one major exemption applies to small businesses. “Small businesses” are defined as:

1. Retailers with less than \$500,000 in gross annual sales, or those with more than \$500,000 in total sales but less than \$50,000 in annual food sales.
2. Manufacturers with fewer than 100 full-time employees who produce fewer than 100,000 units of a product annually. A “unit” includes all package sizes of the same brand and product – for example, both 12 oz. six-packs and 2-liter bottles of the same cola are counted together.



Additional exemptions apply to:

- Restaurant and vendor foods (i.e., farmer's markets, lunch wagons), provided that no nutrition claims are made on menus
- Foods for immediate consumption, such as takeout or food from cafeterias
- Ready-to-eat foods prepared on-site, like bakery or deli items
- Bulk food containers, as long as the food is not sold in that form directly to consumers
- Medical foods
- Dietary supplements (covered under separate regulations, please see the [Dietary Supplement Health Education Act](#))
- Infant formulas (please see [21 CFR 107](#))
- Products with insignificant nutrients, such as tea, coffee, and some spices
- Raw fish, fruits, and vegetables
- Single-ingredient foods
- Game meats, like venison, bison, and rabbit
- Foods in packages with less than 12 square inches of label space. These products must still provide a telephone number or address printed on the label for consumers to obtain nutrition information.

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 240mg	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.	

Whether nutrient values are determined through laboratory testing or a computer database, the company responsible for labeling the product is ultimately accountable for the accuracy of the nutritional information provided.

Each manufacturer must determine the nutrient content for a specified serving size of its food and present that information on the product label using an FDA-approved format.

- For packages with less than 40 square inches of labeling space, alternative label formats are permitted.
- In addition, if a product contains seven or more essential nutrients in insignificant amounts, the nutrition label may qualify to use the Simplified Format.
- More details about format options can be found on the FDA website at <https://www.fda.gov/media/99203/download?attachment>

Nutrition Facts	Servings: 12, Serv. size: 1 mint (2g),
Amount per serving: Calories 5 , Total Fat 0g (0% DV), Sat. Fat 0g (0% DV), <i>Trans Fat</i> 0g, Cholest. 0mg (0% DV), Sodium 0mg (0% DV), Total Carb. 2g (1% DV), Fiber 0g (0% DV), Total Sugars 2g (Incl. 2g Added Sugars, 4% DV), Protein 0g, Vit. D (0% DV), Calcium (0% DV), Iron (0% DV), Potas. (6% DV).	



Nutrient content claims, such as “Low Fat” or “Sugar-Free,” are strictly defined and regulated under the NLEA.

- Similarly, health claims – which link specific dietary components to health outcomes or diseases – are also tightly regulated, and companies must thoroughly understand the requirements before using such claims on their labels.
- Additionally, beverages that contain – or appear to contain – fruit or vegetable juice must clearly state the percentage of juice present in the product.



Allergens

Most food recalls are initiated due to undeclared allergens or improperly labeled products containing allergens.

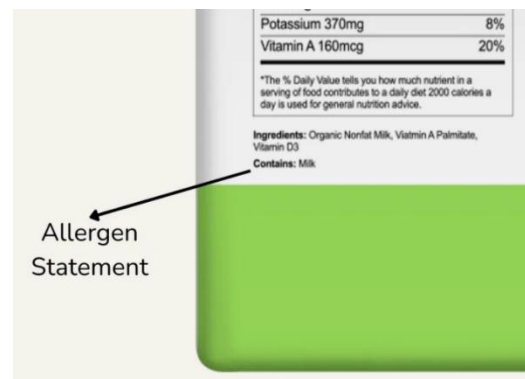
The [Food Allergen Labeling and Consumer Protection Act \(FALCPA\)](#) requires that all food labels must clearly identify ingredients containing any of the nine major food allergens: **milk**, **eggs**, **fish** (such as ahi, moi, or uhu), **crustacean shellfish** (like crab, lobster, or shrimp), **tree nuts** (such as almonds, macadamias, or walnuts), **wheat**, **peanuts**, **soybeans**, and **sesame**.



For more information, including a specific list of tree nuts included in these regulations, please see the FDA's Guidance for Industry .PDF at this link: <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-questions-and-answers-regarding-food-allergen-labeling-edition-5>

There are two acceptable ways to declare these allergens on a packaged food label:

1. In a separate “Contains” statement placed immediately after or next to the ingredient list; or
2. Directly within the ingredient list by using the common name of the allergen in parentheses (e.g., “casein (milk)”).





Additional Information

- Any image or vignette on a food label must accurately represent the product and its origin.
- All text on the label must be at least 1/16 inch tall, unless otherwise exempt or specified, and must contrast clearly with the background to ensure readability.
- Product coding is recommended to support stock rotation and production batch tracking.

Food manufacturers are responsible for the accuracy and compliance of all labels. Failure to follow labeling regulations may lead to the removal of your product from sale and potentially incur civil or administrative penalties. The Hawai'i State Department of Health, Food and Drug Branch (FDB) does not issue label approvals, but FDB encourages manufacturers to submit, via email, label proofs for review and feedback prior to printing.

For detailed guidance, please refer to [Title 21 of the Code of Federal Regulations](#) and the U.S. Food and Drug Administration at www.fda.gov.

For questions or further assistance, contact the Food and Drug Branch at DOH.FDBinfo@doh.hawaii.gov.