

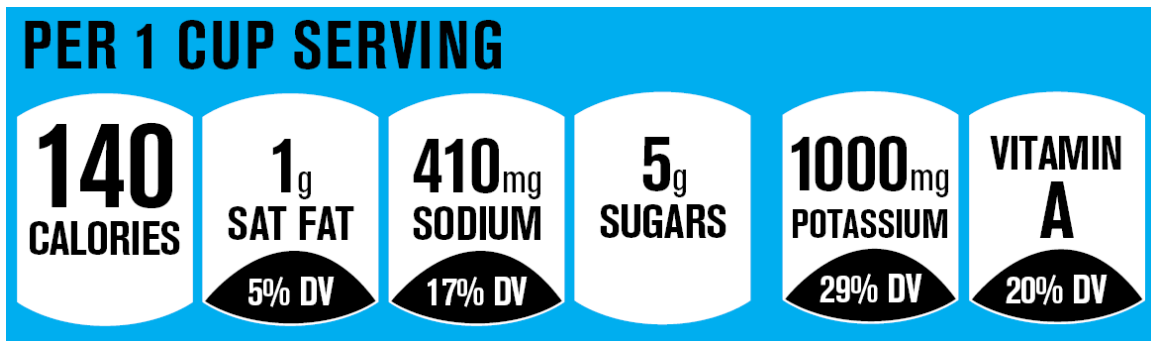
FACTS UP FRONT
(also known as Nutrition Keys)

GMA-FMI Voluntary Front-of-Pack Nutrition Labeling System

REVISED

STYLE GUIDE
FOR IMPLEMENTERS

March 15, 2012



The Facts Up Front front-of-pack nutrition labeling system (also known as Nutrition Keys) has been developed by the Grocery Manufacturers Association (GMA) and the Food Marketing Institute (FMI) as a voluntary industry initiative to communicate key nutrition information to consumers on the front of food packages. The system has been designed to be consistent with all U.S. labeling regulations.

The Facts Up Front front-of-pack nutrition labeling system is intended to be educational in purpose, to allow consumers to observe, understand, and be able to use key nutrient information to make informed food choices for themselves and their families.

While Facts Up Front represents a voluntary front-of-pack nutrition labeling program, implementers of Facts Up Front labeling should apply the labeling to all food products

March 15, 2012

that are eligible. It is acknowledged that phasing in the presentation of Facts Up Front on the labels of all eligible food products will take some time to complete.

NOTE: FDA proposed rules announced in April, 2011 would allow for front-of-pack calorie labeling of foods sold through vending outlets. Until this rulemaking is final, and regulatory issues on presentation are decided, companies with food products in package sizes typically dispensed through vending outlets could delay implementation of Facts Up Front on those product-package combinations.

Guidance in this Style Guide is supplemented by graphic illustrations in the Facts Up Front Label Guidelines, prepared by Greenfield-Belser, the firm that designed the Facts Up Front icons. The graphic illustration supplement is annexed to this Style Guide. Art files are available for Facts Up Front implementers.

Implementers should direct questions and suggestions to factsupfront@gmail.com.

Details of the Facts Up Front front-of-pack nutrition labeling system are outlined in the table below.

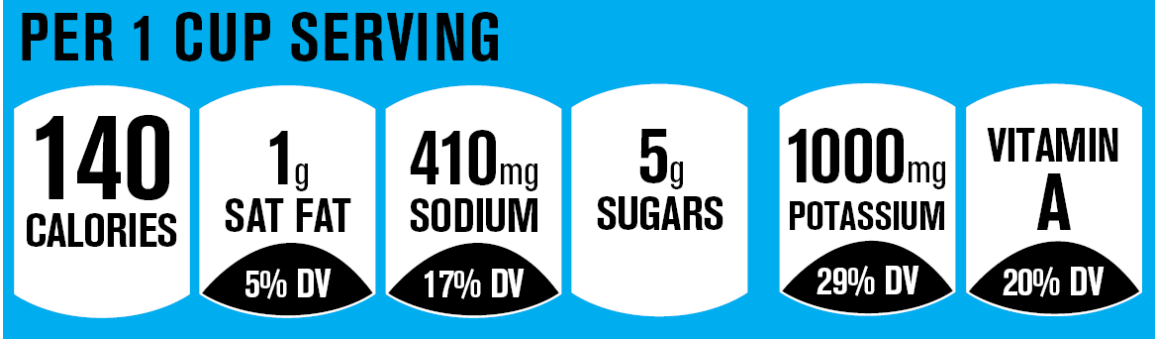
Element	Conditions
Iconography execution overall	<p>While Facts Up Front is a voluntary front-of-pack labeling program, it has adopted a set of defined elements and conditions. Implementers of the Facts Up Front labeling program should follow the elements and conditions as explained in this Style Guide.</p> <p>Facts Up Front consists of a set of rounded, rectangular plaques or icons. The plaque shape is used in similar front-of-pack nutrition labeling globally, including on some food and beverage brands in the US.</p> <p>Each plaque or icon represents quantitative information on the calories and specific nutrients in the food.</p> <p>The name and quantity for calories and the specific nutrients per serving, consistent with nutrition labeling, is inscribed within the plaque or icon.</p>

Facts Up Front
 (also known as Nutrition Keys)
 REVISED
 Style Guide For Implementers

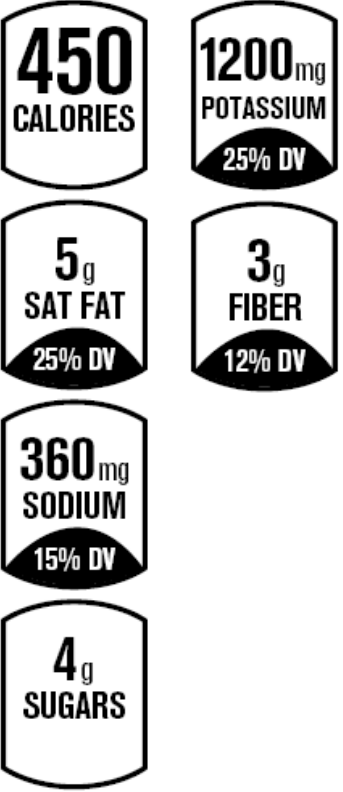
March 15, 2012

Element	Conditions
	<p>Nutrients that have established Daily Values will also display the percent Daily Value per serving in a defined semicircular space at the bottom of the plaque or icon.</p> <p>Information in the plaques or icons is identical to the information declared in Nutrition Facts for that package.</p> <p>Food packages bearing the front-of-pack icons must bear nutrition labeling per existing FDA and USDA regulations.</p> <p>NOTE: Food packages that are exempt from nutrition labeling should only use the Facts Up Front icons if they also use a Nutrition Facts panel on a voluntary basis.</p>
<p>Placement of Facts Up Front Icons</p>	<p>The Facts Up Front icons are placed on the front-of-pack, which is identified in regulations as the principal display panel (PDP) of the food package.</p> <p>NOTE: The principal display panel is defined in regulations at 21 CFR 101.1 (FDA-regulated foods), 9 CFR 317.2(d) (meat) and 9 CFR 381.116(b) (poultry).</p> <p>If a package includes both a PDP and alternate display panels, the Facts Up Front icons should be placed on the PDP. It is not required for the Facts Up Front icons to be placed on alternate display panels.</p> <p>Placement should ensure that the consumer can view the Facts Up Front icons under normal conditions of display for that product.</p>


March 15, 2012

Element	Conditions																					
<p data-bbox="235 468 669 499">Horizontal and vertical formats</p> <p data-bbox="235 541 496 573">Horizontal format:</p> <div data-bbox="235 611 1385 947"><p>The image shows a horizontal layout of six Facts Up Front icons on a blue background. The icons are arranged in a row, each with a white top section and a black bottom section. The top section contains the nutrient name and amount, and the bottom section contains the percentage of Daily Value (DV). The icons are: 140 CALORIES, 1g SAT FAT (5% DV), 410mg SODIUM (17% DV), 5g SUGARS, 1000mg POTASSIUM (29% DV), and VITAMIN A (20% DV). The text 'PER 1 CUP SERVING' is written in white on the blue background above the icons.</p><table border="1"><thead><tr><th>Nutrient</th><th>Amount</th><th>% DV</th></tr></thead><tbody><tr><td>CALORIES</td><td>140</td><td>-</td></tr><tr><td>SAT FAT</td><td>1g</td><td>5% DV</td></tr><tr><td>SODIUM</td><td>410mg</td><td>17% DV</td></tr><tr><td>SUGARS</td><td>5g</td><td>-</td></tr><tr><td>POTASSIUM</td><td>1000mg</td><td>29% DV</td></tr><tr><td>VITAMIN A</td><td>-</td><td>20% DV</td></tr></tbody></table></div> <p data-bbox="235 989 1260 1054">The horizontal layout of the Facts Up Front icons, shown above, is the preferred presentation.</p>		Nutrient	Amount	% DV	CALORIES	140	-	SAT FAT	1g	5% DV	SODIUM	410mg	17% DV	SUGARS	5g	-	POTASSIUM	1000mg	29% DV	VITAMIN A	-	20% DV
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March 15, 2012

Element	Conditions
<p>Vertical format: (Recommended Orientation)</p> <p>PER 1/2 CUP</p>  <p>The image shows six vertical nutrition labels arranged in two columns. The top label is '450 CALORIES'. The second row has two labels: '1200mg POTASSIUM' with '25% DV' below it, and '5g SAT FAT' with '25% DV' below it. The third row has one label: '360mg SODIUM' with '15% DV' below it. The bottom label is '4g SUGARS'. All labels are in a rounded rectangular shape with a black border and white background.</p>	<p>A vertical format may be used when:</p> <ul style="list-style-type: none">• The horizontal format would interfere with mandatory labeling information• Branding architecture or package shape would render the horizontal format illegible.

March 15, 2012

<p>Vertical Format: (Alternate Orientation)</p> <p>PER 1/2 CUP</p> 	<p>The alternate vertical format may be used when both horizontal space and vertical space is limited for the presentation of the groupings of the Facts Up Front icons (Basic icons, Basic + Optional icons)</p>
<p>Graphic distinctiveness</p>	<p>The Facts Up Front icons should be graphically distinct from other label elements located on the PDP, especially other nutrition-related statements (including nutrient content claims, health claims, structure-function claims and dietary guidance statements).</p> <p>Graphic distinctiveness may be created through a number of design techniques, including color or contrast differences, and spatial separation.</p> <p>Additional nutrition information should not be placed so that it appears to be part of the Facts</p>

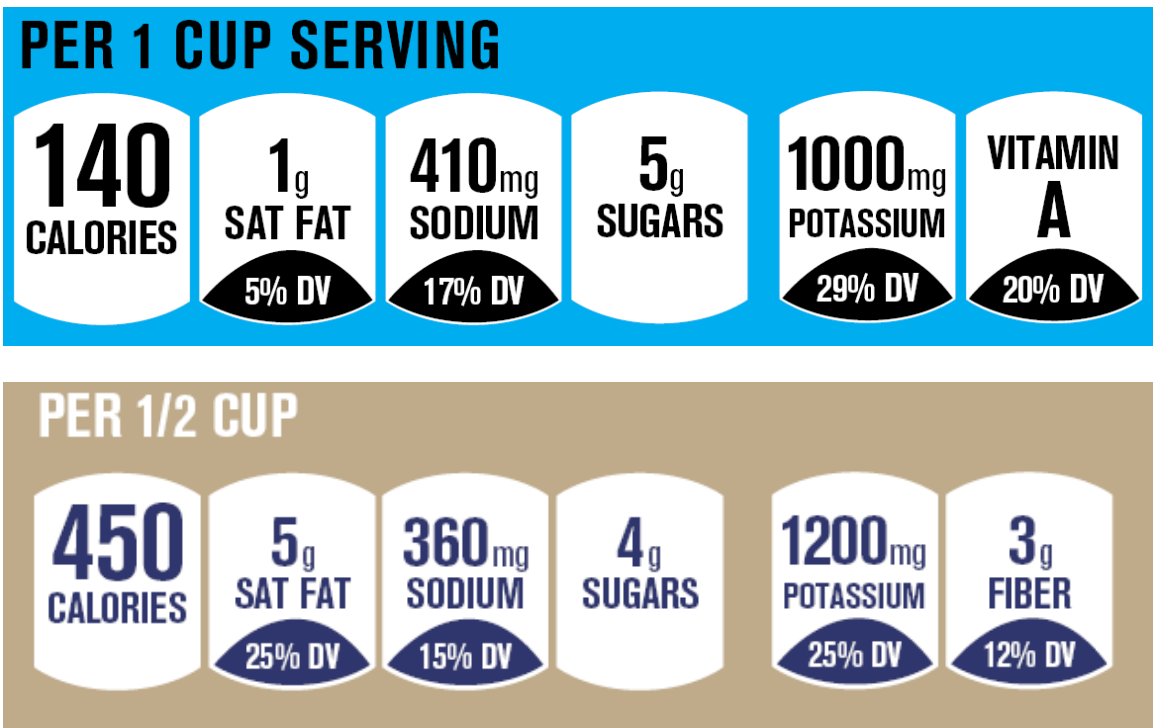
March 15, 2012

	<p>Up Front iconography.</p> <p>Icons or plaques similar in shape to the Facts Up Front icons should not be used for other nutrition-related information presented on the PDP.</p> <p>The Facts Up Front icons should be placed so they do not interfere with required label information (e.g., net contents clear space requirements – see 21 CFR 101.105(f) for FDA-regulated foods, 9 CFR 317.2(h)(8) for meat and 9 CFR 381.121(c)(4) for poultry).</p>
<p>Standard element sizes (icon proportions, fonts, type sizes)</p> <p>Sizes</p>	<p>The design elements in the Facts Up Front icons should be consistent with the design options and technical specifications provided in this Style Guide.</p> <p>The Facts Up Front icons should be noticeable and the information within the icons should be legible to the consumer under the conditions in which they normally view the product on the shelf.</p> <p>Icons are scaled to varying sizes of food package PDPs; larger PDPs bear larger icons. The scale for the icons and related typography follow the same areas of PDP used to determine size of the net contents declaration.</p> <p>The quantitative value for calories should be the largest type size in the Facts Up Front icons.</p> <p>The minimum size of the number of calories in the Calories icon is the minimum size required for the net contents declaration.</p> <p>Icons and enclosed typography may be made larger than this minimum size, but should not be smaller.</p>

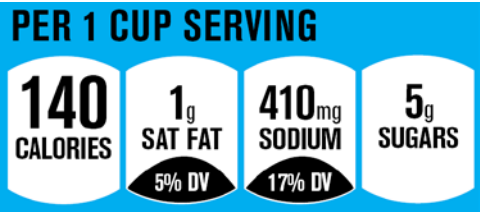
March 15, 2012

<p>Sizes (<i>continued</i>)</p>	<p>In the examples below, the amount of calories represented on the top line of that icon is 100% of the minimum required height of the net contents declaration. The quantities for other nutrients shown in the top line of the icons are 60% of the minimum required height of the net contents declaration.</p>		
	<p>Area of PDP</p>	<p>Size of number of Calories</p>	<p>Size of other nutrient quantities (top line number)</p>
	<p>≤ 5 square inches</p>	<p>1/16 inch (0.0625 inch)</p>	<p>(0.0375 inch)</p>
	<p>> 5 square inches but ≤ 25 square inches</p>	<p>1/8 inch (0.125 inch)</p>	<p>(0.075 inch)</p>
	<p>> 25square inches but ≤ 100 square inches</p>	<p>3/16 inch (0.1875 inch)</p>	<p>(0.1125 inch)</p>
	<p>> 100 square inches but ≤ 400 square inches</p>	<p>¼ inch (0.25 inch)</p>	<p>(0.15 inch)</p>
	<p>> 400 square inches</p>	<p>½ inch (0.5 inch)</p>	<p>(0.3 inch)</p>
	<p>See the graphic illustrations in Facts Up Front Label Guidelines for guidance on detailed measurements.</p>		

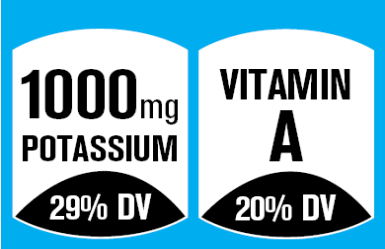
March 15, 2012

<p>Font</p>	<p>The specific type font used in the illustrations is Berthold Akzidenz Grotesk BE Bold Condensed. If this font is not available for use, Gotham Bold Condensed is the alternate sanserif font that should be used.</p>
<p>Color /Contrast</p> 	
	<p>Facts Up Front icons should use a single solid color background with single solid color type that contrasts strongly with the background.</p> <p>The background of the Daily Value spaces must contrast strongly with the body color of the icons.</p> <p>NOTE: There is no requirement that the Facts Up Front icons be placed against a background of continuous tone.</p>

March 15, 2012

	<p>Backgrounds are shown for illustration purposes only.</p> <p>The designs and art files of Facts Up Front include versions with and without an outline stroke. Either version may be used, consistently between icons, to enhance the contrast with the package background.</p> <p>A black/white color scheme may be used.</p> <p>There must be no hue, tone or tint differentiation used between icons.</p> <p>Icon color should not interfere with icon legibility.</p>
<p>Basic icons</p> 	<p>The Basic icons are a standard set of four icons presented together. The Basic icons represent Calories, Saturated Fat, Sodium, and Sugars, in that order. This is consistent with the order of presentation of these elements on the Nutrition Facts panel.</p> <p>Values displayed in Facts Up Front icons must be identical to those declared in the Nutrition Facts panel. This includes observance of the units of measure and rounding rules described in FDA and USDA nutrition labeling regulations.</p> <p>In the horizontal format, the Basic icons are displayed in order left-to-right;</p> <p>In the vertical formats, the Basic icons are displayed in order top to bottom.</p> <p>A small space is inserted between each Basic icon. See the graphic illustrations in Facts Up Front Label Guidelines for guidance on detailed measurements.</p>

March 15, 2012

	<p>The Sugars icon represents total sugars content. The use of the term “Added Sugars” is not permitted.</p> <p>Saturated fat should be abbreviated “Sat Fat,” in all displays of the Basic icons. This is the preferred presentation. No other abbreviations may be used in the Basic icons.</p> <p>Basic icon values of 0 g for Sat Fat or 0 g for Sugars may be reflected in a “not a significant source ...” footnote in the Nutrition Facts Panel, to the extent that use of the footnote is consistent with regulations.</p>
<p>Optional icons</p> 	<p>Up to two Optional icons may be displayed, under certain conditions, when the Basic icons are presented.</p> <p>The Optional icons consist of up to two additional plaques, representing specific additional nutrients required or permitted to be declared in nutrition labeling.</p> <p>Optional icons may represent: Potassium, Dietary Fiber, Protein, Vitamin A, Vitamin C, Calcium, Iron, Vitamin D</p> <p>Six of these nutrients: Fiber, Protein, Vitamin A, Vitamin C, Calcium, and Iron – are required nutrients in nutrition labeling. Two of these nutrients: Potassium and Vitamin D, are additionally identified as nutrients of concern in the <i>Dietary Guidelines for Americans</i>.</p> <p>No other nutrients or food information may be displayed in the Optional icons.</p> <p>When two Optional icons are used, they must be presented in the order presented above, which is consistent with the order of declaration for these nutrients in the Nutrition Facts panel.</p>

March 15, 2012

	<p>In the horizontal format, the Optional icons are displayed in order left-to-right. Optional icons are displayed to the right of the Basic icons, in the horizontal format.</p> <p>In the vertical formats, the Optional icons are displayed in order top to bottom. In the recommended vertical orientation, Optional icons are presented in a column to the right of the Basic icons. In the alternate vertical orientation, the Optional icons are presented below, and separated from, the Basic icons. See the graphic illustrations in Facts Up Front Label Guidelines for guidance on detailed measurements.</p> <p>Optional icons are separated from the group of Basic icons by a space that is at least 3 times the space between the individual icons. See the graphic illustrations in Facts Up Front Label Guidelines for guidance on detailed measurements.</p> <p>Optional icons may not be presented if the Basic icons are not displayed (e.g., in a Calories-only icon presentation).</p> <p>To be included in an Optional icon, the nutrient must provide, and be declared at, at least 10% Daily Value per serving in the Nutrition Facts panel, and must meet the criteria to express a “good source” claim or better (at least 10% Daily Value per RACC), when evaluated as a single food.</p> <p>Optional icons for vitamin A, vitamin C, calcium, iron, or vitamin D must display only the percent Daily Value, consistent with the nutrition labeling regulations for foods.</p> <p>The word “Vitamin” may be abbreviated “Vit” in any of the relevant Optional icons.</p>
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March 15, 2012

	Optional Icon	Include in the icon
	Potassium	Quantity (mg), nutrient name, percent Daily Value
	Fiber	Quantity (g), nutrient name, percent Daily Value
	Protein	Quantity (g), nutrient name, percent Daily Value
	Vitamin A	Nutrient name, percent Daily Value
	Vitamin C	Nutrient name, percent Daily Value
	Calcium	Nutrient name, percent Daily Value
	Iron	Nutrient name, percent Daily Value
	Vitamin D	Nutrient name, percent Daily Value

If an Optional icon is presented for a nutrient that otherwise is not required in nutrition labeling, that nutrient must be declared in the Nutrition Facts panel.

If an Optional icon is presented for protein, an adjusted percent Daily Value for protein must be declared in the Nutrition Facts Panel. To determine the percentage to be declared, the corrected protein score and adjusted percent Daily Value must be calculated using the procedures described FDA and USDA nutrition labeling rules.

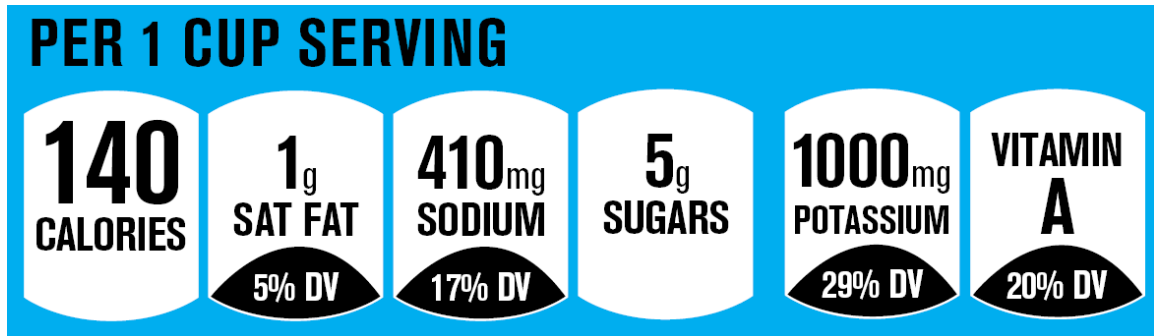
Dietary fiber in an Optional icon may be abbreviated “fiber.” Nutrition labeling regulations recognize “Fiber” as an appropriate abbreviation for dietary fiber. The abbreviated form, “fiber,” is the preferred presentation within the Facts Up Front icons.

March 15, 2012

	<p>If an Optional icon is presented for dietary fiber, and the food is not low in total fat, the label must disclose the grams of fat per labeled serving (e.g., “[X]g of total fat per serving”). The fat disclosure must be in immediate proximity to the fiber icon, presented either above or below the fiber icon. If the fiber icon is the only Optional icon used, the fat disclosure may also be placed to the right of the fiber icon. The fat disclosure should be in a type size no less than half the size of the largest type in the fiber icon. This statement for fat disclosure must be placed closer to the icons than any other disclosure statement that may be required (see below).</p> <p>Disclosure Statement: When Optional icons are used on products that exceed the following amounts of total fat, saturated fat, cholesterol, or sodium, a disclosure statement (e.g., “See nutrition information for X content”) must be used, with X naming the relevant nutrient(s) for which the levels are exceeded. The disclosure statement must appear immediately adjacent to the Optional icon(s). It must be in easily legible boldface print or type, in distinct contrast to other printed or graphic matter, and in a size no less than that required for the net quantity of contents statement. If the size of the largest type in the Optional icon is less than two times the size required for the net quantity of contents statement, the disclosure must be no less than half the size of the largest type in the Optional icon, but no smaller than 1/16 of an inch.</p> <p>The disclosure levels are amounts greater than:</p> <p>Single foods: 13.0 g of fat, 4.0 g of saturated fat, 60 mg of cholesterol, or 480 mg of sodium per RACC, per labeled serving, or, for a food with a RACC of 30 g or less or 2 tablespoons or less, per 50g.</p>
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March 15, 2012

	<p>For meal products: 26 g of fat, 8.0 g of saturated fat, 120 mg of cholesterol, or 960 mg of sodium per labeled serving</p> <p>For main dish products: 19.5 g of fat, 6.0 g of saturated fat, 90 mg of cholesterol, or 720 mg of sodium per labeled serving</p> <p>Fortification: Companies using Optional icons based on added nutrients should pay attention to the FDA Fortification Policy (21 CFR § 104.20). This policy is applicable to both FDA-regulated foods and to meat and poultry products regulated by USDA.</p>
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<p>Accompanying Statement</p> <p>PER 1 CUP SERVING</p>	<p>A statement providing the information on the specific serving size on which the Facts Up Front icons are based is required for all presentations of the Facts Up Front icons.</p> <p>This statement, the Accompanying Statement, must appear adjacent to the presentation of the icons. The preferred placement is above the Facts Up Front icons.</p> <p>The serving size description in the Accompanying Statement must reflect the expression of household measure (per unit, fraction, volumetric measure or ounce) that</p>
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March 15, 2012

	<p>appears on the Nutrition Facts panel of that food package. The statement of metric equivalent of household measure is not required.</p> <p>When the serving size statement of household measure on the Nutrition Facts Panel is long or names multiple food components, the Accompanying Statement may represent a shortened presentation of the serving size information, provided the expression is clear to consumers.</p> <p>The word “serving” may be used.</p> <p><u>Accompanying Statement Examples:</u> Per ½ cup serving Each packet Per pack Per bottle Per 1 cup Each 2 Tbsp serving Per 1 oz.</p> <p>See the graphic illustrations in Facts Up Front Label Guidelines for guidance on detailed measurements.</p>
<p>Calories-Only icon for small packages</p> 	<p>On packages that meet criteria for a small package, a company may elect to present a single icon, for calories, on the PDP.</p> <p>Small packages are those on which the Basic Icons would not fit on the PDP, and are defined as having a PDP of 13 square inches or less.</p> <p>The Accompanying Statement information on serving size must be presented; enclosed within the Calories-only icon. With specific serving size information, the word “Serving” likely will not fit within the calorie icon.</p>

March 15, 2012

	<p>Examples of information in Calories-only icon:</p> <p style="padding-left: 40px;">100 calories per pack 50 calories per stick 200 calories per bar 80 calories per cup</p> <p>No additional Basic icons, and no Optional icons, may be presented on the PDP of a food package that uses the Calories-only Facts Up Front icon.</p> <p>See the graphic illustrations in Facts Up Front Label Guidelines for guidance on detailed measurements for the Calories-only icon.</p>
Special cases	
<p>Exemptions from Facts Up Front icons</p>	<p>A package or a food that is exempt from nutrition labeling should not use the Facts Up Front icons, unless the manufacturer applies nutrition labeling on a voluntary basis.</p> <p>Packages and foods that are exempt from nutrition labeling, as specified in FDA and USDA nutrition labeling regulations, include:</p> <ul style="list-style-type: none"> • Very small packages (< 12 sq in total space available for labeling on the package) • Foods made by very small businesses • Foods that contain no nutrients at declarable levels (e.g., bottled water, spices) • Medical foods • Foods not sold to consumers (e.g., free samples). <p>Foods packaged in a form to be used as a gift is exempt from using the Facts Up Front icons, since nutrition labeling for these products may be enclosed within the package.</p>

March 15, 2012

	<p>Institutional and foodservice products that are not sold directly to consumers are exempt from the Facts Up Front icons, even if a Nutrition Facts Panel is presented on the package.</p> <p>Foods that bear the Nutrition Facts Panel on the PDP are exempt from the Facts Up Front icons.</p>
<p>Special cases: Beverages</p>	<p>The Facts Up Front program recognizes the “Clear on Calories” front-of-pack labeling initiative announced by the American Beverage Association (ABA) during 2010.</p> <p>In the Facts Up Front program, on FDA-regulated beverages, implementers may choose to apply either the “Calories only” icon or the 4 Basic icons and up to 2 Optional icons.</p> <p>Within Facts Up Front, calories and nutrients displayed in the front-of-pack icons are based on the following:</p> <p>Ready to drink sports drinks, bottled water and water beverages, soft drinks and diet soft drinks, energy drinks, and teas:</p> <ul style="list-style-type: none"> • In packages 20 fluid ounces or less, front-of-pack calories (and nutrients) are based on the full container. • In packages greater than 20 fluid ounces, front-of-pack calories (and nutrients) are based on 12 fluid ounces. (See Regulatory Note, below, related to FDA’s draft Compliance Policy Guide.) <p>Ready-to-drink juices and juice drinks:</p> <ul style="list-style-type: none"> • In packages 20 fluid ounces or less, front-of-pack calories (and nutrients) are based on the full container. • In packages greater than 20 fluid ounces,

March 15, 2012

	<p>front-of-pack calories (and nutrients) are based on 8 fluid ounces. (See Regulatory Note, below, related to FDA’s draft Compliance Policy Guide.)</p> <p>All other beverages (including but not limited to fluid milk, milk drinks, milk-type beverages, coffee beverages, powdered beverages, and concentrated beverages):</p> <ul style="list-style-type: none">• Follow the Facts Up Front general rules. <p>For all beverages, the information displayed in the Facts Up Front icons must be included in the Nutrition Facts panel declaration.</p> <p>The Facts Up Front Calories-only icon for beverages is identical in design to the Facts Up Front Calories-only icon for small packages.</p> <p>When the Accompanying Statement is presented on beverage labels in Facts Up Front, the amount of beverage represented in the icon(s) should be described as follows:</p> <p>Calories-only icon: Amount is shown within the icon. Examples:</p> <p>120 calories per cup 80 calories per 8 fl. oz. 200 calories per 12 fl. oz. 150 calories per bottle</p> <p>4 Basic icons: Preferred placement of the Accompanying Statement is above the 4 Basic icons. Examples:</p> <p>Per cup Per 8 fl. oz. Per 12 fl. oz. Per bottle</p>
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March 15, 2012

	<p>No additional Basic Icons, and no Optional icons, may be presented on the PDP of a food or beverage package that uses the Calories-only Facts Up Front icon.</p> <table border="1"><tr><td data-bbox="755 611 1380 646">Regulatory Note:</td></tr><tr><td data-bbox="755 646 1380 1885"><p>Companies manufacturing and marketing beverages should be informed of FDA’s draft Compliance Policy Guide (CPG) 510.800 – Beverages, announced in the Federal Register of December 23, 2010 (75 <u>FR</u> 80828).</p><p>Under this draft CPG, FDA would exercise enforcement discretion for a beverage serving size of 12 fluid ounces, for the following types of beverages, in containers that are larger than 20 fluid ounces and that display calories on the PDP of the label per 12 fluid ounces:</p><ul style="list-style-type: none">(1) Sports drinks(2) Bottled water and water beverages(3) Soft drinks and diet soft drinks(4) Energy drinks(5) Ready-to-drink teas<p>The draft CPG stated that enforcement discretion for the 12 fluid ounce serving size, in containers larger than 20 fluid ounces, “does not apply to any other beverages, including 100% juices, diluted juice beverages, alcoholic beverages, or 100% milks.”</p><p>The draft CPG reflects the FDA’s response to the American Beverage Association’s request that FDA exercise enforcement discretion for industry to label certain beverages based on a 12 fluid ounce serving size.</p></td></tr></table>	Regulatory Note:	<p>Companies manufacturing and marketing beverages should be informed of FDA’s draft Compliance Policy Guide (CPG) 510.800 – Beverages, announced in the Federal Register of December 23, 2010 (75 <u>FR</u> 80828).</p> <p>Under this draft CPG, FDA would exercise enforcement discretion for a beverage serving size of 12 fluid ounces, for the following types of beverages, in containers that are larger than 20 fluid ounces and that display calories on the PDP of the label per 12 fluid ounces:</p> <ul style="list-style-type: none">(1) Sports drinks(2) Bottled water and water beverages(3) Soft drinks and diet soft drinks(4) Energy drinks(5) Ready-to-drink teas <p>The draft CPG stated that enforcement discretion for the 12 fluid ounce serving size, in containers larger than 20 fluid ounces, “does not apply to any other beverages, including 100% juices, diluted juice beverages, alcoholic beverages, or 100% milks.”</p> <p>The draft CPG reflects the FDA’s response to the American Beverage Association’s request that FDA exercise enforcement discretion for industry to label certain beverages based on a 12 fluid ounce serving size.</p>
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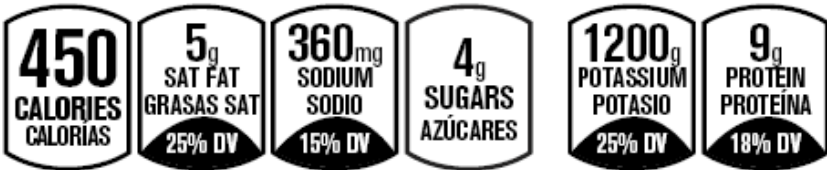
March 15, 2012

<p>Special cases: Infant and toddler foods</p>	<p>The Facts Up Front icons should not be used on foods specifically formulated for infants and children less than 4 years of age, for consistency with the nutrition labeling regulatory framework.</p> <p>Because Daily Values used in nutrition labeling and in the Facts Up Front icons apply to the population age 4 and older, it is inappropriate to apply the Facts Up Front labeling to foods specifically formulated for younger individuals.</p>
<p>Special cases: Presenting Facts Up Front icon information for food “as packaged”</p>	<p>As with nutrition labeling, the representation of the food “as packaged,” in most cases, is the required display for Facts Up Front.</p> <p>For most FDA-regulated foods, the nutrient values in nutrition labeling are required to be based on the nutrients in the food as packaged or as purchased (21 CFR 101.9(b)(9)). Foods packaged in liquid where the liquid is not typically consumed would base the nutrient declarations on the drained container contents. Packaged raw, single ingredient fish and shellfish would base their nutrient declarations on the cooked edible portion of the product (21 CFR 101.45(a)(2))</p> <p>For FSIS-regulated meat and poultry products, nutrient declarations are required to be based on the product as packaged, except that single-ingredient, raw products may be declared on the basis of the product “as consumed.” 9 CFR 317.309(b)(3); 9 CFR 381.409(b)(3). In addition, as policy, USDA-FSIS has permitted bacon with a cook yield of 40% or less and sausage type products with a cook yield of 76% or less to be labeled only on the cooked basis:</p> <p>The Facts Up Front icons are based on the nutrition labeling declaration required by</p>

March 15, 2012

	<p>regulation, or permitted to be displayed when only a single declaration is used in Nutrition Facts. The Facts Up Front icons may not use nutrition values for the food “as prepared” when both “as packaged” and “as prepared” forms are permitted in nutrition labeling.</p>
<p>Special Cases: Use of Facts Up Front icons with Dual Column Nutrition Labeling</p>	<p>Except in the special case of Beverages, the Facts Up Front icons present information from the Nutrition Facts Panel, based on the serving size derived from the Reference Amount Customarily Consumed, including the presentation of single serving containers. Facts Up Front icons do not present information on alternate permitted presentations of serving information (e.g., voluntary whole package nutrition labeling, per 100 grams, per slice, etc.).</p>
<p>Special Cases: Dietary supplements</p>	<p>The Facts Up Front icons are not appropriate for use on dietary supplement labels (which use “Supplement Facts” labeling).</p>
<p>Special cases: Multi-unit retail packages</p>	<p>Multi-unit retail packages are those packages where multiple containers of the same food are enclosed within an outer wrapper or package. The Facts Up Front icons should appear on the primary PDP of the multi-unit retail package that is visible to the consumer at retail sale. Use of Facts Up Front icons on individual units within the multi-unit retail package is optional, unless the package is labeled “not for retail sale.” Packages labeled “not for retail sale” should not display the Facts Up Front icons.</p>
<p>Special Cases: Variety Packs</p>	<p>Variety packs are those food packages that present multiple containers of different foods within an outer wrapper or package.</p>

March 15, 2012

	<p>Variety packs should present, on the outer wrapper or package, only the Facts Up Front Calories-only icons for each of the different foods enclosed within the variety pack. The Calories-only icons should be presented together, and may be arrayed horizontally or vertically. Each Calories-only icon should be separated from the next Calories-only icon by at least the same amount of space that separates Basic icons from Optional icons. See the graphic illustrations in Facts Up Front Label Guidelines for guidance on detailed measurements.</p> <p>All the Style Guide provisions for Calories-only icons should be followed.</p> <p>Descriptive information for each food in the variety pack should be presented immediately above each Calories-only icon.</p>
<p>PER 1/2 CUP – POR 1/2 TAZA</p> 	
<p>Special cases: Bilingual Icons</p>	<p>Bilingual presentation of the Facts Up Front icons is an option, at the manufacturer or distributor’s election.</p> <p>Facts Up Front icons may be presented in bilingual format, with the words within and outside the icons presented in two languages (numeric values would be constant).</p>

March 15, 2012

	<p>Presentation of bilingual Facts Up Front icons should align with regulatory policy (e.g., 21 CFR 101.15(c)(3) for FDA-regulated foods).</p>
<p>Regulatory Alignment</p>	<p>This Style Guide outlines program requirements for the Facts Up Front front-of-pack nutrition labeling system, including aesthetic and technical guidelines that will help ensure that the system is implemented in a uniform and consumer-friendly way. Although the system is designed to be consistent with all applicable federal labeling regulations, each participant is responsible for ensuring that finished product labels comply with all applicable laws and regulations. Regulatory compliance requires, among other things, consideration of the specific context in which information is presented. As a result, if the Facts Up Front system is combined with other labeling elements, the combination may affect the overall regulatory status of the finished label.</p>
<p>Enforcement Discretion, FDA-regulated foods bearing Facts Up Front icons</p>	<p>In a letter dated December 13, 2011 to GMA and FMI, FDA granted enforcement discretion regarding the use of the Facts Up Front icons on the following conditions:</p> <ul style="list-style-type: none"> • Use of the Facts Up Front Basic Icons only and use of the Facts Up Front Basic Icons with any Facts Up Front Optional Icons, without declaration of polyunsaturated fat and monounsaturated fat in the Nutrition Facts Panel. • Use of the Facts Up Front Basic Icons only without use of a disclosure statement when the nutrient content of the food exceeds levels of total fat,

Facts Up Front
(also known as Nutrition Keys)
REVISED
Style Guide For Implementers

March 15, 2012

	<p>saturated fat, cholesterol or sodium that otherwise may require use of a disclosure statement.</p> <ul style="list-style-type: none">• Use of the Facts Up Front Basic Icons only, and use of the Facts Up Front Basic Icons with any Facts Up Front Optional Icons, without disclosure of the level of total fat and cholesterol in immediate proximity to the saturated fat icon. <p>FDA's letter of enforcement discretion notes that these allowances are granted to the Facts Up Front front-of-pack labeling system, and are not granted to similar front-of-pack labeling systems that do not conform to the Facts Up Front Style Guide.</p>
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