



January 20, 2006

Brief Labeling Guide for Olive Oil

Almost all food labeling regulations are enforced by the US Food and Drug Administration (FDA). One exception is the Country of Origin Marking Requirement that is enforced by the U.S. Customs Service, but even that regulation can be enforced by the FDA.

The major focus on food labeling in the United States today is on nutrition.

Olive oil companies must comply with regulations on:

- nutritional labeling
- net weight declarations
- metric declarations
- country of origin marking requirements
- labeling in two languages
- product descriptions

Nutritional Labeling Regulations

Nutritional Labeling Regulations became effective August 6, 1994.

Nutrient Declarations

21 CFR Section 101.9 sets out and explains all the nutrients that need to be declared on the food label, as well as those that may be declared. There are a few exemptions for products that have no significant food value, i.e. less than 5 calories per serving and for products in very small containers. For the latter, there must be a telephone number or an address on the label that the consumer can contact for nutritional information.

FDA specified the following nutrients must be declared on a label: calories, total fat, saturated fat, trans fat cholesterol, sodium, total carbohydrate, dietary fiber, sugars, protein, vitamin A, vitamin C, calcium and iron. However when a product, such as olive oil, contains insignificant amounts* of seven or more of these nutrients, only the following nutrients must be declared: total calories – calories from total fat – total fat – saturated fat – trans fat – total carbohydrate – protein – sodium, and nutrients present in more than insignificant amounts.

*An “insignificant amount” is defined as an amount that allows a declaration of zero in nutritional labeling, except that for total carbohydrates, dietary fiber, and protein, it shall be an amount that allows a declaration of “less than one gram.”

Additionally, the serving size and the number of serv-

ings per container must be declared. The serving size is declared in a common household measure and in grams or milliliters (if product is fluid). For olive oil the serving size would be 1 tablespoon (15 mL).

When a company decides to add a declaration to the simplified format, such as “monounsaturated fat”, then the statement “Not a significant source of...” must be added, as shown on the next page.

Calories must be expressed to the nearest 5-calorie increment up to and including 50 calories, and in 10-calorie increments above 50 calories. Amounts less than 5 calories may be expressed as zero (0).

In determining Caloric Content, one may calculate calories by using specific Atwater factors (i.e., the Atwater method) given in Table 13 “Energy Value of Foods-Basis and Derivation,” by A.L. Merrill and B.K. Watt, USDA Handbook No. 74. This book is available from: Division of Nutrition, Center for Food Safety & Applied Nutrition (HFF-260), FDA, 5100 Paint Branch Parkway, College Park, MD 20740-3835.

Calories from Fat must be expressed to the nearest 5-calorie increment up to and including 50 calories, and in 10-calorie increments above 50 calories. Amounts less than 5 calories may be expressed as zero (0).

Calories from saturated fat are not required. This declaration is voluntary.

Total Fat (total lipid fatty acids expressed as triglycerides) must be declared in grams to the nearest ½ gram increments below 5 grams and to the nearest gram increment above 5 grams. Under ½ gram may be expressed as zero (0).

Saturated fat (sum of all fatty acids containing no double bonds) may be declared as 0 if there is less than ½ gram per serving.

Trans Fatty Acid: As of Jan. 1, 2006, all food product labels will be required to declare the amount of trans fatty acids in the product. Please note that FDA has not yet set a daily recommended value for trans fatty acids.

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Polyunsaturated fat is a voluntary declaration unless there is a declaration for monounsaturated fat, or a statement is made about fatty acids or cholesterol on the label.

Monounsaturated fat is also a voluntary declaration, unless there is a declaration of polyunsaturated fat, or a statement is made about fatty acids or cholesterol on the label.

Cholesterol need not be declared if there is less than 2 milligrams per serving. If it is not declared, a footnote is required stating: "Not a significant source of cholesterol". For 2-5 milligrams, the declaration must be: "less than 5 milligrams." When more than 5 milligrams, the declaration must be to the nearest 5-milligram increment. Alternatively, if the cholesterol is less than 2 milligrams per serving, it can be declared as zero.

Sodium must be declared. Under 5 milligrams per serving, the declaration is zero. Between 5 and 140 milligrams the declaration is the nearest 5 gram increment. Over 140 milligrams the declaration is the nearest 10 gram increment.

Carbohydrate or Total Carbohydrate must be declared to the nearest gram. Under ½ gram, the declaration is zero.

Protein must be declared to the nearest gram. Under ½ gram, the declaration is zero. Under 1 gram may be declared as "Less than 1 gram."

Footnotes: Most olive oil companies include information on their labels on polyunsaturated fat, monounsaturated fat, and cholesterol. Therefore, they have to include the following footnotes on their label:

"Not a significant source of dietary fiber, sugars, vitamin A, vitamin C, calcium, and iron."

"*Percent Daily Values are based on a 2,000 calorie diet."

Format for Nutritional Label

There are two illustrations below indicating the format for the nutritional label for olive oil.

In the first illustration, the percentage of daily value is based on the actual amount of each nutrient before rounding. The percentage of daily value for total fat is 21%. This percentage is based on the actual fat in a tablespoon, namely, 13.6 grams.

In the second illustration the percentage of daily value for total fat is 22% which is based on the amount declared on the label, i.e. 14 grams.

FDA states that "The percent shall be calculated by di-

viding either the amount declared on the label for each nutrient or the actual amount of each nutrient (i.e., before rounding) by the Daily Recommended Value (DRV) for the nutrient."

The Daily Recommended Value for total fat is 65 grams, and for saturated fat, it is 20 grams. When one di-

Illustration 1.

Nutrition Facts	
Serving Size 1 Tbsp (15mL)	
Servings Per Container	
Amount Per Serving	
Calories 120	Fat Cal. 120
% Daily Value *	
Total Fat 14g	21 %
Saturated Fat 2g	9 %
Trans Fat 0g	
Polyunsaturated Fat 1.5g	
Monounsaturated Fat 10g	
Cholesterol 0mg	0%
Sodium 0mg	0%
Total Carbohydrate 0g	0%
Protein 0g	

Not a significant source of dietary fiber, sugars, vitamin A, vitamin C, calcium and iron.

*Percent Daily Values are based on a 2,000 calorie diet.

Illustration 2.

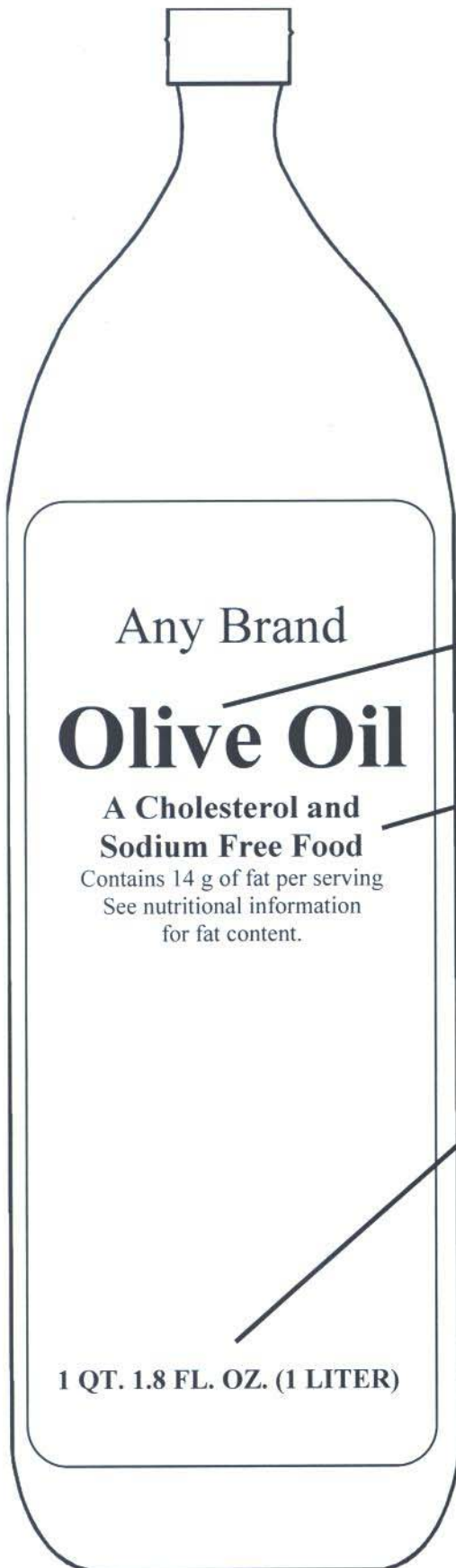
Nutrition Facts	
Serving Size 1 Tbsp (15mL)	
Servings Per Container	
Amount Per Serving	
Calories 120	Fat Cal. 120
% Daily Value *	
Total Fat 14g	22 %
Saturated Fat 2g	10 %
Trans Fat 0g	
Polyunsaturated Fat 1.5g	
Monounsaturated Fat 10g	
Cholesterol 0mg	0%
Sodium 0mg	0%
Total Carbohydrate 0g	0%
Protein 0g	

Not a significant source of dietary fiber, sugars, vitamin A, vitamin C, calcium and iron.

*Percent Daily Values are based on a 2,000 calorie diet.

vides 13.6 grams by 65 grams the result is 21%. When one divides 14 grams by 65 grams, the result is 22%.

Likewise for the saturated fat, when one divides the actual amount, for example 1.88 grams, by 20 grams the result is 9%. When one divides the declared saturated fat of 2 grams by 20 grams the result is 10%.



Principal Display Panel

Bold Type – size of the type to be reasonably related to the most prominent printed material on the label. It shall be parallel to the base of the label.

If this claim is made on the label, the disclosure statement that follows must be used.

Country of Origin, *the country from which the oil is imported or in which it is packed*, may appear on the principal display panel.

Net Contents must be easily readable in bold face print or in a type that is in distinct contrast to the background. It must appear in the bottom 30% of label and be parallel to the bottom of the label.

Type size requirements differ depending on the size of the label: On labels of 5 square inches or less the type is to be at least one-sixteenth inch; over 5 square inches and under 25 square inches – not less than one-eighth inch type; over 25 but under 100 square inches – not less than three-eighth inch type; over 100 square inches but under 400 square inches – not less than one-quarter inch type.

If a foreign language is used on any label, all the required information must be in both English and the foreign language.

Information Panel



Claim can be made here without any explanation.

Required Nutritional Statement

Country of Origin must appear close to the address that appears on the label. It must be easily readable and in type size at least as big as the name of the company listed below it.

Name of U.S. distributor or packer abroad.

Code is not required by government. It is required by retailers. It should be placed after or before all government required information.