

Nutrient Content Claims and What They Mean:

Content Claims ("Free," "Low," "Reduced/Less")

	Free	Low	Reduced/Less
Synonyms	"Zero", "No", "Without", "Negligible Source of", "Nutritionally Insignificant"	"Slight", "Minimal", "A Few Calories", "Minor Source of"	"Less", "Reduced", "Fewer Calories"
Specific Conditions	If no special processing is needed, specify in the label (e.g., "broccoli is naturally fat-free"). "Altered" can be used in the title.	State if no special processing is needed to meet criteria (e.g., "celery is naturally low in calories").	Must specify if the food naturally meets the criteria.
Meal Definitions	Based on the labeled serving size. Caloric definitions are not provided.	Use the same definitions as individual foods, calculated per 100g of the food.	Follows individual food definitions, calculated per 100g of the food.

Definitions of Nutrient Content Claims

Source: Appendix A & B of The Official FDA Food Labeling Guide

(<https://www.fda.gov/files/food/published/Food-Labeling-Guide-%28PDF%29.pdf>)

Nutrient	Free	Low	Reduced/Less	Comments
Calories	Less than 5 cal per RACC and per labeled serving	40 cal or less per RACC (and per 50g if RACC is small) For meals and main dishes: 120 cal or less per 100 g.	At least 25% fewer calories per RACC than an appropriate reference food (for meals and main dishes, at least 25% fewer calories per 100 g) Uses term "Fewer" rather than "Less"	"Light" or "Lite": Must meet certain criteria based on the percentage of calories from fat For dietary supplements: Calorie claims only allowed if the reference product is greater than 40 calories per serving
Total Fat	< 0.5g per RACC and labeled serving No ingredient that is or contains fat	≤ 3g per RACC (or per 50g if RACC is small) Meals: ≤ 3g per 100g and max 30% calories from fat	At least 25% less fat per RACC than reference food Meals: At least 25% less fat per 100g than reference food	"100% Fat Free" if Low Fat criteria met; Reference food must not be Low Fat; Not applicable for dietary supplements < 40 calories per serving "100% Fat Free" if Fat Free; "Light" refers to previous Calorie comments

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<p>Saturated Fat</p>	<p>< 0.5g saturated and trans fat per RACC and labeled serving</p> <p>No ingredient containing saturated fat</p>	<p>≤ 1g per RACC and max 15% calories from saturated fat</p> <p>Meals: ≤ 1g per 100g and < 10% calories from saturated fat</p>	<p>At least 25% less saturated fat per RACC than reference food</p> <p>Meals: At least 25% less saturated fat per 100g than reference food</p>	<p>Must declare cholesterol and total fat next to claims if above certain thresholds</p> <p>Not applicable for dietary supplements < 40 calories per serving</p>
<p>Cholesterol</p>	<p>< 2mg per RACC & labeled serving</p> <p>No ingredient that contains cholesterol</p>	<p>Meals: ≤ 20mg per 100g</p>	<p>Meals: At least 25% less cholesterol per 100g than reference food</p>	<p>Reference food cannot be "Low Cholesterol"</p>

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<p>Sodium</p>	<p>< 5mg per RACC & labeled serving</p> <p>No ingredient containing sodium</p>	<p>≤ 140mg per RACC (or per 50g if RACC is small)</p> <p>Meals: ≤ 140mg per 100g</p>	<p>At least 25% less sodium per RACC than reference food</p> <p>Meals: At least 25% less sodium per 100g than reference food</p>	<p>"Light" if "Low Calorie" & "Low Fat" and sodium reduced by 50%; "Very Low Sodium": ≤ 35mg per RACC</p> <p>"Light in Sodium" if reduced by at least 50% per RACC; "Salt Free" must meet "Sodium Free"; "No Salt Added" and "Unsalted" must declare if not "Sodium Free"</p>
<p>Sugars</p>	<p>< 0.5g per RACC & labeled serving</p> <p>No ingredient containing sugar</p>	<p>Not Defined</p>	<p>At least 25% less sugars per RACC than reference food</p> <p>Meals: At least 25% less sugar per 100g</p>	<p>"No Added Sugars" allowed if no sugar added during processing; Must state if not "Low" or "Reduced Calorie"</p> <p>"Unsweetened" and "No Added Sweeteners" are factual statements; Not applicable for dietary supplements of vitamins & minerals except for children <2 yrs</p>

Additional Requirements for Nutrient Content Claims

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Relative Claims

Relative Claim	Criteria for Comparison
"Light"	<ol style="list-style-type: none">1. Food representative of the type bearing the claim (e.g., average value of top three brands).2. Similar food (e.g., potato chips for potato chips).
"Reduced" and "Added" (or "Extra," "Plus," "Fortified," "Enriched")	<ol style="list-style-type: none">1. An established regular or average representative product.2. Similar food.
"More" and "Less" (or "Fewer")	<ol style="list-style-type: none">1. An established regular or average representative product.2. A dissimilar food in the same product category (e.g., potato chips for pretzels) or a similar food.

Additional Guidelines:

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- Percent (or fraction) of change and identity of the reference food must be declared immediately adjacent to the most prominent claim. (21 CFR 101.13(j)(2)(i) and 21 CFR 101.13(j)(2)(ii))
- Quantitative comparison of the nutrient in the product per labeled serving with that in the reference food must be declared either adjacent to the claim or on the information panel. (21 CFR 101.13(j)(2)(iv)(A))
- A relative claim for decreased levels of a nutrient may not be made if the nutrient content of the reference food meets the requirement for a "low" claim for that nutrient. (21 CFR 101.13(j)(3))

Other Nutrient Content Claims

Claim Type	Requirements	Regulation Reference
High, Rich In, Excellent Source Of	Contains 20% or more of the DV per RACC. Can be used on meals or main dishes to indicate a food meeting the definition but not to describe the meal itself.	21 CFR 101.54(b)

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<p>Good Source, Contains, Provides</p>	<p>10-19% of the DV per RACC. Can be used on meals or main dishes to indicate a food meeting the definition but not to describe the meal itself.</p>	<p>21 CFR 101.54(e)</p>
<p>More, Enriched, Extra, Plus, Fortified, Added,</p>	<p>10% or more of the DV per RACC than an appropriate reference food. May only be used for vitamins, minerals, protein, dietary fiber, and potassium.</p>	<p>21 CFR 101.54(e)</p>
<p>Lean</p>	<p>For seafood or game meat: Less than 10g total fat, 4.5g or less saturated fat, and less than 95mg cholesterol per RACC and per 100g.</p> <p>For mixed dishes: criteria vary.</p>	<p>21 CFR 101.62(e)(1)-(3)</p>
<p>Extra Lean</p>	<p>Less than 5g total fat, less than 2g saturated fat, and less than 95mg cholesterol per RACC and per 100g.</p>	<p>21 CFR 101.62(e)(4) & (5)</p>

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High Potency	May describe individual vitamins or minerals at 100% or more of the RDI per RACC, or a multi-ingredient food meeting certain criteria.	21 CFR 101.54(f)
Modified	Used in the statement of identity for a food bearing a relative claim (e.g., "Modified fat cheesecake, contains 35% less fat than our regular cheesecake.")	21 CFR 101.13(k)
Fiber Claims	If a fiber claim is made and the food is not low in total fat, the label must disclose the level of total fat per labeled serving.	21 CFR 101.54(d)(1)
Antioxidant Claims	Must meet multiple criteria, including established RDI, scientific evidence of antioxidant activity, and sufficient levels of each nutrient. Names of nutrients must be part of the claim.	21 CFR 101.54(g)

Implied Claims (According to 21 CFR 101.65)

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- **Nutrient or Ingredient Absence/Presence:** Claims suggesting that a nutrient or ingredient is absent or present in a specific amount, or that a food may contribute to a healthy diet, are considered implied claims (e.g., "healthy, contains 3 grams of fat").
- **Good Source/Low In Claims:** If a food is known to contain an ingredient rich in a particular nutrient, it can be labeled as "Low" in or a "Good Source" of that nutrient (e.g., "good source of oat bran").
- **Equivalence Claims:** Statements like "contains as much [nutrient] as a [food]" are allowed if both the reference food and the labeled food qualify as a "Good Source" of the nutrient per serving (e.g., "Contains as much vitamin C as an 8-ounce glass of orange juice").
- **Exceptions:** Label statements related to religious or food intolerance reasons, non-nutritive substances, added value, identity, or special dietary compliance usually aren't considered implied claims unless made in a nutrition context.
- **Use of 'Healthy' and Related Terms:** The term "healthy" and its variants may be used if the food meets specific requirements outlined in 21 CFR 101.65(d)(2).

Conditions for the Use of "Healthy"

Criteria	Individual Food	Seafood/Game Meat	Meal/Main Dish
TOTAL FAT	Low fat	< 5 g fat /RACC & /100g	Low fat

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SATURATED FAT	Low sat fat	< 2 g sat fat /RACC & /100g	Low sat fat
SODIUM	≤ 480 mg /RACC and /l.s.; or /50 g, if RACC is small	≤ 480 mg /RACC and /l.s.; or /50 g, if RACC is small	≤ 600 mg /l.s.
CHOLESTEROL	≤ Disclosure level	< 95 mg /RACC & /100g	≤ 90 mg /l.s.
BENEFICIAL NUTRIENTS	Contains at least 10% of DV /RACC for vitamins A, C, calcium, iron, protein, or fiber except certain exceptions*	Contains at least 10% of DV /RACC for vitamins A, C, calcium, iron, protein, or fiber	Contains at least 10% of DV /l.s. of two nutrients (main dish) or three nutrients (meal) of vit. A, vit. C, calcium, iron, protein, or fiber.

*Exceptions include raw fruits and vegetables; single ingredients or mixtures of frozen or canned fruits and vegetables that don't change the nutrient profile; and enriched cereal-grain products.

Note:

- l.s. = labeled serving
- RACC = Reference Amount Customarily Consumed per Eating Occasion
- Small RACC = 30 g or less, or 2 tablespoons or less

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Claims on Foods for Infants and Children Less than 2 Years of Age

Claim Type	Condition	CFR Reference
Percentage of vitamins and minerals	Permitted	21 CFR 101.13(q)(3)(i)
Infant Formulas	As provided for in Part 107	21 CFR 101.13(b)
Unsweetened & Unsalted	Permitted as taste claims	21 CFR 101.60(c)(3)
Sugar Free & No Added Sugar	Permitted on dietary supplements only	21 CFR 101.60(c)(4)

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