



Consumer's Guide

— TO —

Food Labels & Nutrition Claims

The number of claims on food labels can be overwhelming for consumers. It is challenging to know what claims are regulated and which ones are not. In this consumer's guide to food labels, we will break down what these terms mean—and what they don't. Of note, government agency regulated claims are intended to offer more consumer protections than non-regulated or voluntary claims.

Non-GMO

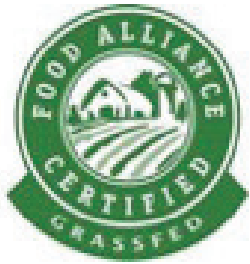
Non-GMO: Genetically Modified Organisms (GMOs) are living organisms whose DNA has been changed through genetic engineering. This process can make the crop more pest-, herbicide-, disease- or even drought-resistant. It has also been used to increase the vitamin content in certain foods. There are currently only ten commercially available GMO crops in the United States, and they are alfalfa, apples, corn, canola, cotton, papaya, potatoes, soybeans, squash and sugar beets. The Non-GMO Project is a third-party verification program managed by a non-profit organization that verifies whether a product contains GMOs. The labels can be found on over 35,000 products, including food items that would not contain a genetically modified ingredient which may be misleading or confusing to consumers. While the use of GMOs is prohibited in organic products, having a non-GMO label does NOT mean the product is organic. In 2016, the National Academies of Science, Engineering, and Medicine issued a report that stated they “found no substantiated evidence that foods from GE [genetically engineered] crops were less safe than foods from non-GE crops.” *This label claim is NOT regulated by a government agency.*

Bioengineered

Bioengineered: Passed by Congress in 2016 and announced in 2018, the National Bioengineered Food Disclosure Law defines bioengineered foods as those that “contain detectable genetic material that has been modified through certain lab techniques and cannot be created through conventional breeding or found in nature.” In short, this label means the product contains genetically modified or bioengineered ingredients. Animals and products derived from animals that consumed genetically modified feed are not required to have the bioengineered label. The “Bioengineered,” “Derived from Bioengineering,” and “Made with Bioengineering labels” will be required on applicable products in 2022. This label was created in response to demand for a regulated claim regarding the presence of genetically modified ingredients in food products. Again, the National Academies of Science, Engineering, and Medicine stated that they found no substantiated evidence that foods from genetically engineered crops were less safe than foods from non-GE crops. *This label claim IS regulated by a government agency.*



Grass Fed



Grass Fed: Up until 2016, the Agricultural Marketing Service, a branch of the USDA, regulated the “grass fed” term. As of now, animal raising claims (such as “grass fed”) are required to be approved by Food Safety and Inspection Service (FSIS), another USDA branch. Unlike the “organic” certification by USDA, which requires farm visits and audits, terms regulated by FSIS only require signed and dated written descriptions of how animals are raised. No other forms of evidence are needed and many of these terms don’t have standard definitions, so these types of claims aren’t quite as reliable as certifications such as organic. However, there are some third parties that do grass fed certifications with more stringent rules. These include the American Grassfed Association and the Food Alliance. Both certifications require unscheduled visits and inspections to ensure claims are accurate. The American Grassfed Association requires farmers to undergo a complete on-farm inspection and show that their animals were fed a lifetime diet of 100% grass or hay, raised on pasture and not in confinement, and that the animals were never treated with added hormones or antibiotics. The Food Alliance’s certification requires that animals must be on pasture for their entire lives, cannot be confined in pens where grass or hay are not grown, cannot be confined in short-term holding pens for more than 30 days per year, are not fed grain or grain byproducts, and cannot be given any antibiotics or hormones. You may also see terms such as “grain finished” or “grass finished.” These terms are also regulated by FSIS and refer to the feed the cow was fed in the weeks leading up to slaughter. If a cow is “grass finished” it could mean the cow grazed for the entirety of its life, or only for its last few weeks. “Pasture raised” means the cattle spent some time outside, but it doesn’t guarantee they were grass fed. Lastly, organic beef is not necessarily grass fed. Organic certification only requires that cows be pastured for 120 days “when accessible.” *This label claim is loosely regulated by a government agency.*

Organic

Organic: The “organic” certification is verified and managed by USDA. In broad terms, organic means that operations protect natural resources, conserve biodiversity, and use substances that are approved by the USDA for organic certification. Use of GMOs is prohibited in organic farming practices. With both “100% Organic” and “Organic,” the organic seal is allowed, GMOs are prohibited, and certification by the USDA is required.

In contrast to “100% Organic,” the term “Organic” can be accompanied with the USDA organic seal and must contain 95% certified organic ingredients. You may also see the terms “Made with Organic” and “Organic Ingredients.” The organic seal is not allowed to be used with these terms. “Made with Organic” products must have at least 70% certified organic ingredients, be free from GMOs, and be certified by the USDA. Products labeled “Organic Ingredients” do not have to have a specific percentage of ingredients organic, can contain GMOs, and are not required to be certified by the USDA. *This label claim is regulated by a government agency.*



Cage Free

Cage Free: Eggs that are marketed as “cage free” and packed under a USDA Grade Shield, must be verified by the USDA through farm visits that occur at least twice per year. The USDA’s Agricultural Marketing Service (AMS) approves this claim, on eggs packed under a USDA Grade Shield, and is to be used when the eggs are produced by hens that have unlimited access to food and water and can roam freely during the laying cycle. This claim does not mean that the hens have access to the outdoors. This label claim is regulated by a government agency, if packed under a USDA grade shield.



Free Range

Free-Range: Eggs that are marketed as “free range” and packed under a USDA Grade Shield, must be produced by hens that are housed in a building or area that allows for unlimited access to food, water, and continuous access to the outdoors during their laying cycle. This is the difference between cage free and free range—the access to the outdoors component. For eggs packed under a USDA Grade Shield using this label, it is verified by the USDA’s AMS. This label claim is regulated by a government agency, if packed under a USDA grade shield.



Natural

Natural: All-Natural or 100% Natural is a claim we see on SO many food items today. The USDA defines “Natural,” when pertaining to meat and poultry, as “a product containing no artificial ingredient or added color and is only minimally processed. Minimal processing means that the product was processed in a manner that does not fundamentally alter the product.” Additionally, the label must include a statement explaining the meaning of the term natural. Natural does NOT mean organic and it does not necessarily mean the item is healthy. The FDA is working to formally define what the term natural means through scientific research and public comment. According to an informal policy the FDA has defined “natural” to mean “nothing artificial or synthetic (including colors regardless of source) is included in, or has been added to, the product that would not normally be expected to be there.” *This label claim is loosely regulated by a government agency.*



Keto



Keto: There are two main labels you might see: “Keto Certified™” and “Certified Keto.” “Keto Certified™” is trademarked by the Paleo Foundation and was created in 2016. To have this label, the foundation states that meal and meal replacement products must contain no more than 10g of carb per serving, snacks no more than 6g carb per serving, and condiments no more than 2g carb per 0.5 oz. For products with reduced digestibility (think very high fiber foods), a few additional grams of carbohydrates are allowed. Products cannot contain partially-hydrogenated trans fats, alcohol ketone bodies, ketone esters, artificial sweeteners, artificial flavors, corn syrups, or maltitol. The other keto label, “Certified Ketogenic,” is controlled by Ketovangelist, LLC. Products with this label cannot contain sugar, grains, soy, or high-glycemic carbohydrates. While avocado oil and olive oil are allowed, no other vegetable oils are permitted. Artificial colorings, preservatives, sweeteners, and flavors are prohibited. There are no carbohydrate gram requirements. Labels may say “Certified Ketogenic,” “Ketogenic Approved,” or “Ketogenic Friendly.”

When it comes to keto labeling, keep in mind that reaching a state of ketosis, where the body does not have enough glucose for energy and burns stored fat instead, is highly individualized and there is no consensus on what makes a product “keto.” Some people can enter ketosis by consuming more carbohydrates than others while some highly sensitive people can be knocked out of ketosis by starches in topically applied lotions. Therefore, even if a product is labeled as “keto” that doesn’t mean it will necessarily induce or keep you in ketosis. If you are on a medically prescribed ketogenic diet you cannot rely on keto labels and you must consult with a doctor or Registered Dietitian to determine which products are acceptable. *This label claim is NOT regulated by a government agency.*

Paleo

Paleo: Certified by the Paleo Foundation, this third-party label means the product is free from all grains and “pseudograins” such as barley, rice, oats, corn, quinoa, and buckwheat, just to name a few. Products must also be free from legumes, dairy, and artificial colorings, preservatives, sweeteners, flavorings, or flavor enhancers. *This label claim is NOT regulated by a government agency.*



Vegan

Vegan: The Certified Vegan Logo that may be present on food labels is trademarked and managed by vegan.org. This label means the product is free from animal products and byproducts (as well as insect products such as honey and silk) and is not tested on animals. *This label claim is NOT regulated by a government agency.*



No Hormones

No Hormones: Claims pertaining to hormones in food are regulated by the USDA's FSIS. Hormones are only approved for use in beef cattle and sheep raising. They are not approved for use in poultry, swine, bison, goats, and other species and if you see a "no hormones" label on these products you should also see a disclaimer stating that federal regulations prohibit the use of hormones in pork and poultry. For cattle and sheep, the "Raised Without Hormones" label means the animals have not been given hormones or steroids from birth to harvest. Labels that state "rBGH-free or rBST-free" may be found on dairy products and are regulated by the FDA. They must include the statement- "No significant difference has been shown between milk derived from rBST-treated and non-rBST-treated cows." It is important to note that hormones are present naturally in our food and in our bodies. *This label claim is regulated by a government agency.*

No Antibiotics

No Antibiotics: Claims pertaining to antibiotic usage are regulated by the USDA's FSIS. It is unlawful for antibiotics to exist in our foods and animal products are tested for antibiotics prior to entering our food system. There is a withdrawal period that must be adhered to between when antibiotics are given to an animal and when the animal enters the food system which ensures the food products from that animal are free from antibiotics. Beginning in 2017, the FDA banned antibiotic usage for growth promotion or feed efficiency in animals which has reduced the use of antibiotics. "No Antibiotics Ever" means the animal never received antibiotics in their lifetime. "Raised Without Antibiotics," means that animals haven't been given antibiotics in their feed, water, or through injections. *This label claim is regulated by a government agency.*

Gluten Free

Gluten Free: Gluten is a protein naturally found in wheat, rye, barley, and crossbreeds of these grains. While most people tolerate gluten well, when people with celiac disease consume gluten, they have an immune reaction that destroys the lining of their small intestine. For this reason, the FDA issued guidelines about gluten-free labeling in 2013. The FDA requires that foods labeled “gluten-free” contain less than 20 ppm (parts per million) of gluten. This is the lowest level that can be reliably detected in food using validated testing methods. You may also see “Grain Free Gluten Free” labels. These are certified by the Paleo Foundation and require that products have less than 10ppm of gluten and do not contain any grains or grain-based ingredients, stabilizers, or preservatives (regardless of whether or not the grains contain gluten). The “Certified Gluten-Free™” logo is trademarked and managed by the Gluten-Free Certification Organization. They define “gluten free” as ingredients or products consistently having no more than 10 ppm gluten, as determined by validated test methods AND whole grain products with no more than 0.25 gluten-containing grains per kilogram.

The “gluten-free” label claim is regulated by a government agency, the “Certified Gluten Free” claim is NOT regulated by a government agency.



Certified Humane

Certified Humane: The “Certified Humane Raised and Handled™” label is trademarked and managed by the non-profit Humane Farm Animal Care. This label means that animals are never kept in cages, that animals must have adequate space and fresh water, and that they are fed a healthy diet without added antibiotics or hormones. Human Farm Animal Care has animal care standards for each species that producers must demonstrate meeting before being certified. *This label claim is NOT regulated by a government agency.*



Fair Trade




Fair Trade: The “Fair Trade Certified™” label is trademarked and managed by the non-profit Fair Trade USA. This label means that companies provide safe conditions for workers, protect the environment, build sustainable livelihoods, and put money back into the community in which they operate. *This label claim is NOT regulated by a government agency.*



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