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Preamble:

The “Nutrition Keys” front-of-pack nutrition labeling system 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 FDA labeling regulations.

Details of the “Nutrition Keys” front-of-pack nutrition labeling system are outlined in the table below.
### Element: Iconography execution overall

“Nutrition Keys” 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.

Each plaque represents quantitative information on the calories and specific nutrients in the food. The name and quantity for calories and the specific nutrients per serving, consistent with nutrition labeling, is inscribed within the plaque. 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.

Information in the plaques is identical to the information declared in Nutrition Facts for that package. Food packages bearing the front-of-pack icons must bear nutrition labeling per existing regulations.

**NOTE:** Food packages that are exempt from nutrition labeling should only use the “Nutrition Keys” icons if they also use a Nutrition Facts panel on a voluntary basis.

### Element: Placement

The “Nutrition Keys” icons are placed on the front-of-pack, which is identified in regulations as the principal display panel (PDP) of the food package.

Placement should ensure that the consumer can view the “Nutrition Keys” icons under normal conditions of display for that product.
## Horizontal and vertical formats

### The horizontal layout of the “Nutrition Keys” icons, shown at the top of this style guide, is the primary configuration, but the vertical layout could be used when:

- Horizontal layout interferes with mandatory labeling information
- Branding architecture or package shape would render the horizontal layout illegible.

The “Nutrition Keys” icons should be visually 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).

### Graphic distinctiveness

Graphic distinctiveness may be created through a number of design techniques, including color or contrast differences, and spatial separation. Similarly shaped icons should not be used for nutrition-related information on the PDP, aside from the “Nutrition Keys” system.

The “Nutrition Keys” icons should be placed so they do not interfere with required label information (e.g., net content clear space requirements).
### Standard element sizes (icon proportions, fonts, type sizes)

| The design elements in the “Nutrition Keys” icons should be consistent with the provided design options and technical specifications. |
| The “Nutrition Keys” 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. |
| The quantitative value for calories should be the largest type size in the “Nutrition Keys” icons. |
| Icons are scaled to varying sizes of food package PDPs; larger PDPs bear larger icons. Scaling factors use the same PDP areas as the required minimum type size for net contents declaration. (See 21 CFR 101.105(i)) |
| In the examples, 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 is 60% of the minimum required height of the net contents declaration. |
| The specific type font used in the illustrations is Berthold Akzidenz Grotesk BE Bold Condensed. |
| If a different specific font is used, it must be drawn from the sanserif font families. |
“Nutrition Keys” icons should use a single solid color background with single solid color type that contrasts strongly with the background.

The background of the Daily Value spaces must contrast strongly with the body color of the icons.

A black/white color scheme may be used.

There must be no hue, tone or tint differentiation used between icons.

Icon color should not interfere with icon legibility.
### Basic icons

The Basic Icons are a standard set of four icons used 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.

Values displayed in “Nutrition Keys” icons must be identical to those declared in the Nutrition Facts panel. This includes observance of units of measure and rounding rules per regulations. When displayed horizontally, the order is left to right; when displayed vertically, the order of Basic Icons is top to bottom.

The sugars icon represents total sugars content. The use of the term “Added Sugars” is not permitted.

Saturated fat may be abbreviated “Sat Fat,” as permitted in nutrition labeling regulations. This is the preferred presentation. No other abbreviations may be used in the Basic Icons.

### Optional icons

The Optional Icons consist of up to two additional plaques, representing specific additional nutrients required or permitted to be declared in nutrition labeling.

Optional icons may represent: Potassium, Dietary Fiber, Protein, Vitamin A, Vitamin C, Calcium, Iron, Vitamin D. When two Optional Icons are used, they must be presented in this order, which is consistent with the order of declaration for these nutrients in the Nutrition Facts panel.
No other nutrients may be represented in the Optional Icons.

The Optional Icons may only be included when the full array of Basic Icons is displayed.

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.

Optional icons are displayed to the right of the Basic Icons, in a horizontal presentation. In a vertical presentation, the optional icons are to the right of the basic, in a second column. Optional Icons are separated from the Basic Icons by a space that is at least 3X the space between the individual icons.

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.

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, the percent Daily Value for protein must be determined per regulation and the adjusted value, based on the corrected protein score, must be declared in the Nutrition Facts panel.

Dietary Fiber in an Optional Icon may be abbreviated “Fiber,” consistent with nutrition labeling regulations. The abbreviated form, “Fiber,” is the preferred presentation. If an
Optional Icon is presented for dietary fiber, and the food is not low in total fat, the required fat disclosure statement must be declared adjacent to the fiber icon.

| Accompanying statement | A statement providing the serving size on which the “Nutrition Keys” icons are based is required for all presentations of the “Nutrition Keys” icons. This statement, the Accompanying Statement, must appear adjacent to the presentation of the icons. The serving size description must be the same as appears on the Nutrition Facts panel of that food package. The word “serving” may be used. Accompanying Statement Examples: Per ½ cup serving Each packet Per pack Per bottle Per 1 cup Each 2 Tbsp serving Per 1 oz. |
**Calorie icon for small packages**

Packages that meet criteria for small package may elect to present a single icon, for calories, on the PDP. The Accompanying Statement must be presented.

Small packages are those on which the Basic Icons would not fit on the PDP. Small packages are defined as having a PDP of 13 square inches or less.

No additional Basic Icons, and no Optional Icons, may be presented on the PDP of a food package that uses the calorie-only icon.

For the calorie-only icon, the Accompanying Statement describing the serving size is included within the icon.

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**Special cases**

**Exemption from “Nutrition Keys” icons**

A package or a food that is exempt from nutrition labeling should not use the “Nutrition Keys” icons, unless the manufacturer applies nutrition labeling on a voluntary basis.

Packages and foods that are exempt from nutrition labeling, as specified in regulations, include 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, and foods not sold to consumers (e.g., free samples). The regulatory exemption from nutrition labeling applies unless nutrition claims, or nutrition information, is presented.

Since the “Nutrition Keys” icons constitute a type of nutrient content claim, use of the icons would trigger the requirement to include a Nutrition Facts panel.
## Special cases: Beverages

A product that is within the scope of the American Beverage Association (ABA) “Clear on Calories” front-of-pack labeling initiative (i.e., a non-alcoholic beverage), may follow either the ABA approach for declaring calories only, following the ABA style guide, or the GMA-FMI approach, for front-of-pack labeling, following the “Nutrition Keys” style guide, as the beverage company elects.

## Special cases: Infant and toddler foods

The “Nutrition Keys” 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.

Because Daily Values used in labeling apply to the population age 4 and older, it is inappropriate to apply the labeling to foods specifically formulated for younger individuals.

## Special cases: Presenting icon information for food “as prepared”

As an option, it is permitted to show “Nutrition Keys” icons for the food “as prepared.” To use this option, the “as prepared” form of the food must be presented in Nutrition Facts, as nutrition labeling regulations permit. The information in the “Nutrition Keys” icons “as prepared” must be shown in the Nutrition Facts panel. If the “Nutrition Keys” present nutrition information as prepared, a statement of “as prepared” must be placed adjacent to the Accompanying Statement or the array of icons.

## Special Cases: Dietary supplements

The “Nutrition Keys” icons are not appropriate for use on dietary supplement labels (which use “Supplement Facts” labeling)
### Special cases: Multi-unit retail packages

Multi-unit retail packages are those packages where multiple containers of the same food are enclosed within an outer wrapper or package. The “Nutrition Keys” icons should appear on the primary PDP of the multi-unit retail package that is visible to the consumer at retail sale. Use of “Nutrition Keys” 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 “Nutrition Keys” icons.

### Special cases: Bilingual Icons

Bilingual presentation of the “Nutrition Keys” icons is an option, at the manufacturer or distributor’s election. “Nutrition Keys” icons may be presented in bilingual format, with the words within and outside the icons presented in two languages (numeric values would be constant). Both languages must be presented in the Nutrition Facts declaration. This presentation is consistent with regulations at 21 CFR 101.15(c)(3).

### Regulatory obligations

The following citations are reminders of FDA labeling regulations that apply to the use of the “Nutrition Keys” icons.

Any product carrying the icons must also provide nutrition labeling (21 CFR 101.13(n))

Nutrition labeling declaration must include declarations for polyunsaturated fat and monounsaturated fat, when the saturated fat icon is used, unless total fat is declared as zero. (21 CFR 101.9(c))

The regulatory disclosure statement must be used when icons are presented on foods that exceed
disclosure levels (for total fat, saturated fat, cholesterol, or sodium). The disclosure statement would appear adjacent to the PDP claim with largest type size (21 CFR 101.13(h)).

(For reference, the disclosure levels are amounts greater than:
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 50 g.

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

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

The disclosure statement is “See nutrition information for __ content” with the blank filled by the name(s) of the nutrient(s) requiring disclosure.)

The regulatory statements must be used disclosing levels of total fat and/or cholesterol in association with the saturated fat icon, unless the food declares total fat as 0 grams or cholesterol as 0 mg. (21 CFR 101.62(c))

If an Optional Icon is presented for a nutrient that is not otherwise required to be declared in nutrition labeling, that nutrient must be declared in the Nutrition Facts panel (21 CFR 101.9(c), 21 CFR 101.13(n)).

If an Optional Icon is presented for protein, the percent Daily Value for protein, corrected for protein digestibility and amino acid content, must
be declared in the Nutrition Facts panel (21 CFR 101.9(c)(7)).

If an Optional Icon is presented for fiber, and the food is not low in total fat, the required fat disclosure statement must be declared adjacent to the fiber icon (21 CFR 101.54(d)).

Companies using Optional Icons based on added nutrients should attend to the Fortification Policy (21 CFR 104.20).