

Made in USA Claim Checklist

For private label supplements and skincare

Brand:

Date:

The TRACE check

- T — Track** every ingredient and component to where it was made.
- R — Rank** imported inputs by cost share and how central they are.
- A — Assess** where final and all significant processing happen.
- C — Choose** the claim: unqualified, qualified, Assembled in USA or none.
- E — Evidence** keep supplier origin statements and cost calculations.

Result → “Made in USA” · “Made in USA of U.S. and imported ingredients” · No origin claim

Before you put “Made in USA” on a label or listing

- ☐ Final processing (mixing, filling, encapsulating) happens in a U.S. facility.
- ☐ All significant processing steps happen in the U.S.
- ☐ Written country-of-origin statement for every ingredient and component.
- ☐ Imported inputs ranked by share of product cost.
- ☐ Defining ingredients (actives, base, signature botanical) are U.S.-made, or the claim is qualified.
- ☐ Qualifier, if any, is clear, prominent and easy to understand.
- ☐ California 5%/10% wholesale-value test run if you sell there.
- ☐ Packaging, Amazon/Walmart listings, website and ads all say the same thing.
- ☐ Flags, maps and “American-made” wording reviewed as possible implied claims.
- ☐ Evidence file dated and re-checked after any supplier or formula change.

California: foreign parts ≤ 5% of final wholesale value (≤ 10% if not available in the U.S.)

Notes:

Planning aid only, not legal advice. Confirm origin claims against your supplier documentation and counsel.