

Sugar-Free Gummy Label Checklist

Complete before you request quotes. Numbers in brackets refer to the sources below.

Brand / product

Date

CLAIM AND SUGARS

Less than 0.5 g of sugars per reference amount and per labeled serving [1]

No sugar ingredient unless it is asterisked in the ingredient list and footnoted as adding a trivial amount of sugar [1]

A “low calorie” or “reduced calorie” claim the product qualifies for, or “not a reduced calorie food,” “not a low calorie food” or “not for weight control” next to the claim each time it is used [1]

SWEETENER SYSTEM

Sugar alcohols declared on the Supplement Facts panel when a claim is made about them [7]

If using allulose: calories at 0.4 kcal/g, and allulose left out of Total and Added Sugars only as FDA's guidance describes [2]

If using monk fruit or stevia: high-purity, GRAS-notified extracts (stevia: 95%+ steviol glycosides) [13]

Full composition on file for any sweetener blend: dextrose carriers count as sugar [1]; erythritol carriers are sugar alcohols [7]

If using sorbitol where foreseeable intake could reach 50 g a day: “Excess consumption may have a laxative effect.” [4]

QUALITY AND SHELF LIFE

Finished-batch specifications for identity, purity, strength and composition on file [9]

Stability data that supports the labeled amount through the expiration date

Notes

SOURCES

1. 21 CFR 101.60(c)(1), “sugar free” claims
2. FDA, “The Declaration of Allulose and Calories from Allulose on Nutrition and Supplement Facts Labels” (Oct 2020)
3. CyberColloids, “Introduction to Pectin: Properties”
4. 21 CFR 184.1835(e), sorbitol labeling
5. Cohen PA et al., JAMA, April 2023
6. 21 CFR 101.9(c)(1)(i)(F), calorie factors for sugar alcohols
7. 21 CFR 101.36(b)(2)(i), Supplement Facts: sugar alcohols
8. 21 CFR 101.9(c)(6)(iv), sugar alcohol declaration
9. 21 CFR 111.70(e), finished-batch specifications
10. 21 CFR 101.13(a), scope of nutrient content claims
11. PMG, “Private Label vs Custom Formulation”
12. PMG, “Nutraceuticals & Supplements”
13. FDA, “Aspartame and Other Sweeteners in Food” (updated Feb 2025)
14. 21 CFR 101.9(c)(6)(ii), definition of total sugars

General planning aid, not legal or regulatory advice. Confirm label requirements with your regulatory reviewer.