

Private Label Supplement Label Checklist

Complete before you approve a private label supplement label for print.

Brand

Date

THE LABEL LOCK: 5 STEPS TO APPROVE A PRIVATE LABEL SUPPLEMENT LABEL

- 1. Lock the formula.** Final ingredient amounts, sources and serving size from your manufacturer.
- 2. Build the panel.** Supplement Facts with % Daily Values, "Daily Value not established" symbols, and blend weights.
- 3. Write the front.** Product name with "dietary supplement" (or "[ingredient] supplement") and net quantity.
- 4. Check the claims.** Structure/function wording only, evidence on file, disclaimer formatted, FDA notice calendared for 30 days after launch.
- 5. Close the back.** "Other ingredients," allergens, "Distributed by [your brand]" with address, and an adverse event contact.

LABEL CHECKLIST

- ☐ Product name includes "dietary supplement" or "[ingredient] supplement"
- ☐ Net quantity on the front panel
- ☐ "Supplement Facts" title, serving size, hairline box, 8-point minimum for most text
- ☐ % Daily Value where one exists; "Daily Value not established" symbol where it doesn't
- ☐ Proprietary blend: total weight, ingredients in descending order by weight
- ☐ Ingredient list directly below the panel ("Other ingredients" if sources are named in the panel)
- ☐ Botanicals: plant part named in English; Latin name in parentheses if the common name isn't in Herbs of Commerce
- ☐ "Manufactured for" or "Distributed by" + your brand name, city, state, ZIP
- ☐ Domestic address or phone number for serious adverse event reports
- ☐ Major allergens declared ("Contains" statement or parentheses), including sesame
- ☐ Structure/function claims: evidence on file, bold disclaimer at least 1/16 inch, FDA notice within 30 days of launch
- ☐ Required statements at least 1/16 inch tall

Notes

SOURCES

FDA, Dietary Supplement Labeling Guide; 21 CFR 101.3, 101.4, 101.5, 101.36 and 101.93
 FDA, Q&A on labeling of dietary supplements under the Dietary Supplement and Nonprescription Drug Consumer Protection Act
 FDA, Structure/Function Claims; FDA, Food Allergies; FALCPA; FTC, Health Products Compliance Guidance (December 2022)

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