

smartlabel®
By Consumer Brands Association

Implementation Manual 3.1 for Food and Beverage Products

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Version 3.1 – Changes

This version of the Implementation Manual for Food and Beverage Products contains the following changes:

1. **Leaving SmartLabel Notification**
    - The language on the iFrame notification that users are leaving SmartLabel has been modified to read they are being taken to an "external" site. The change accommodates third party websites like Recycle Check. This change is required.

2. **Recycle Check and CIRT Check Implementation**
    - This new section describes the SmartLabel partnerships with The Recycling Partnership (Recycle Check) and Can I Recycle This? (CIRT Check) and how to implement their platforms — zip-code level lookups for local recycling information — on the intermediate menu or on the Company, Brand & Sustainability tab. Recycle Check and CIRT Check contact information is provided for SmartLabel participants interested in this voluntary feature.

3. **GS1 US Sunrise 2027: 2D Barcodes and SmartLabel**

    - This new section on GS1 US Sunrise 2027 describes 2D barcodes and their compatibility with SmartLabel. By the end of 2026, retailers will start transitioning their POS systems to be capable of reading 2D barcodes. Consumers can scan the same 2D barcodes with their native smartphone app to access the SmartLabel page.

4. **Products Exempt from Nutrition Labeling**
    - For products that are exempt from Nutrition labeling, there is new text that appears on the Nutrition tab to inform consumers that nutrition labeling is not mandatory with a reference to the USDA Food Data Central website and the company/brand website for more information.

5. **FDA Interactive Nutrition Facts Panel**
    - FDA offers an interactive Nutrition Facts Panel (NFP) to educate consumers on how to understand and use the NFP. To engage consumers, it is recommended that a link to the interactive panel be prominently placed on the tab below the NFP.

6. **Facts up Front**
    - In January 2026, Added Sugars will replace Total Sugars in the Facts up Front at the top of the Nutrition tab. As brands phase in Added Sugars on their packaging, please remember to update the SmartLabel page as well.

7. **Voluntary BE Disclosure**
    - Manufacturers of foods or food ingredients that do not meet the definition of bioengineered food and that are derived from a food on the List of Bioengineered Foods may digitally disclose such foods with the Derived from Bioengineering symbol or text.

8. **Additional Guidance for Infant Formula**
    - Additional guidance from Hogan Lovells is provided for Infant Formula for the Use by Date, Product Instructions and Added Water Requirements.

9. **Baby Food Testing Implementation**
    - New guidance on how to implement California AB 899 and Maryland HB 97 in SmartLabel using the intermediate menu or a direct link in Health & Safety under the About this Product tab.

10. **Preparing the SmartLabel Page for Integration with eCommerce Sites**
    - Step-by-step instructions are provided for properly preparing SmartLabel pages for embedding in retailer e-commerce sites.

11. **Updated Appendix A – Best Practices**
    - New interactive templates and graphics depict best practices in the development of SmartLabel pages, including the use of the Certifications badge and voluntary information. Links are provided to the interactive templates.

I. Executive Summary

SmartLabel is an industry supported, evolving digital initiative that helps the consumer packaged goods (CPG) industry respond to consumer demands for more information about the products they use and consume.

Created by the CPG industry and operated by the Consumer Brands Association (CBA) and Food Industry Association (FMI). SmartLabel is the leading digital solution for both mandatory and voluntary product information, enabling brands to share more than could ever fit on a product label — from allergens and ingredient functions to information about packaging and recycling.

SmartLabel makes it possible to comply with state and federal digital disclosure requirements, such as California's Cleaning Product Right to Know Act of 2017 and the National Bioengineered Food Disclosure Standard.

The SmartLabel team provides brands with guidance on the attributes and design specifications to build the SmartLabel landing pages. Each brand creates, hosts, and updates its own pages to ensure the most accurate and up-to-date information. Because SmartLabel data is brand-controlled, it can be integrated into standard data management practices and updated in response to product innovations or packaging redesigns. Implementation is typically an interdisciplinary company activity, involving IT, data management, regulatory, supply chain, marketing, and other consumer-facing functions.

II. Program Overview

a. Introduction

Consumers are demanding more information about the products they purchase. These may include the nutritional profile of a snack food, the chemical components in personal care products, the use of bioengineered (BE) ingredients in food, or the sustainability practices of a brand.

The ability for a consumer to access product information builds trust and brand loyalty. That is the essence of SmartLabel. SmartLabel is a voluntary program designed to meet transparency demands by consumers for thousands of food, beverage, supplement, household cleaning, pet care, personal care, and over-the-counter products.

Due to product packaging limitations and rapid changes in consumer trends and preferences, it is difficult to provide comprehensive product information across all packaging types and sizes. In addition, the consumer's thirst for information is not always consistent. But one thing is clear, when consumers want to know, they want to know immediately.

SmartLabel exists as a solution to bridge the communication between brands and consumers by providing a platform for credible, useful, and accurate information organized in a consistent fashion that is readily and easily accessible.

SmartLabel focuses on serving three consumer demands:

- **Information access:** Consumers want access to information that was previously inaccessible (or difficult to access).
- **Information clarity:** Consumers want to be able to make sense of the information provided.
- **Information accuracy:** Consumers want to know that information is fact-based, up-to-date, and accurate.

The **foundation** of SmartLabel is the hundreds of attributes that can be disclosed to consumers. These attributes are found in the accompanying Food and Beverage Attribute List and are covered in Section V. The **essence** of SmartLabel is the way those attributes are displayed — in a consistent fashion across the five tabs on the SmartLabel landing pages. The **engine** that makes SmartLabel work includes:

- GS1's global, open standards
- The range of paths a consumer can take to access SmartLabel landing pages
- Use of the Global Data Synchronization Network (GDSN) for seamless, accurate information flow to the SmartLabel landing pages

To summarize, SmartLabel:

- **Is not a centralized, industry-owned, or industry-managed database.** It is the brand's data, and it is maintained by the brand owners. All information and consumer access belong to the brand owners.
- **Is not a third-party application or a centralized data repository.** It is a consistent landing page template that resides on the brand's web servers (or a third-party web host) containing the brand's data.
- **Is built on widely available search and mobile technology.** This makes it easier than ever for brand owners to offer consumers additional product information without compromising product packaging.

SmartLabel is focused on using a consistent, digital format to provide clear, accurate, and easily accessible information via search or mobile scan.

b. Legal and Trademark Information

Information contained on SmartLabel landing pages may be subject to regulation as labeling and advertising under federal and state law, including laws administered by the Food and Drug Administration (FDA), the U.S. Department of Agriculture (USDA), the Federal Trade Commission (FTC). **It is the responsibility of participating brands to ensure that the information provided on SmartLabel landing pages is complete, accurate and in accordance with applicable regulatory requirements.**

Securing the SmartLabel trademark

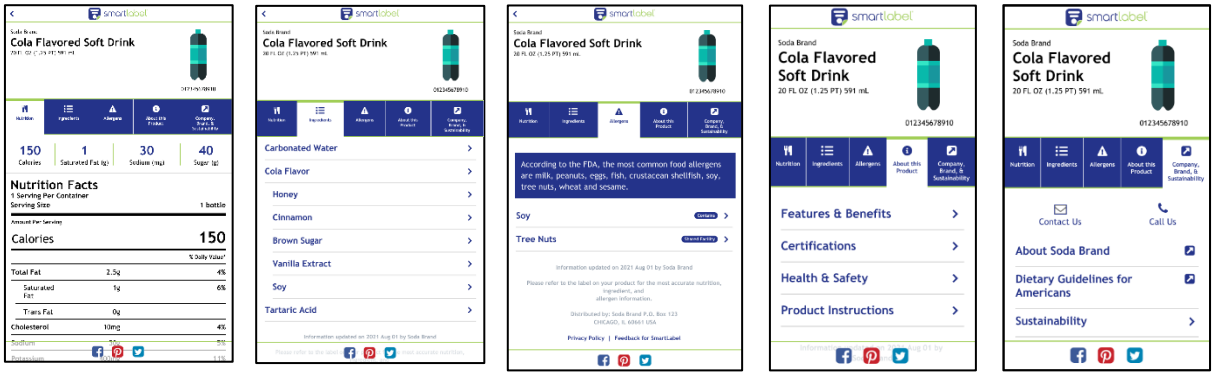
Participating companies must secure a trademark for:

1) Use of the SmartLabel logo:

   The logo can be used on physical packages and/or in digital environments where the SmartLabel contains a URL link to the item's SmartLabel landing page.

NOTE: The SmartLabel logo on the physical package must be used in conjunction with a digital trigger (QR code, barcode, digital watermark) that directs the consumer to a SmartLabel landing page.

2) Use of the SmartLabel landing page template:



Companies that use the SmartLabel logo and/or replicate the SmartLabel landing page without purchasing a license or adhering to the implementation guidelines contained in this document will receive a cease and desist letter and be pursued for trademark violation.

The SmartLabel brand office is responsible for issuing trademarks and maintaining the integrity of the program.

c. Release Cadence

Implementation manual revisions will be released as needed when substantive updates to SmartLabel are made. This schedule provides participating companies with consistent release timing for new guidance on mandatory or voluntary features for the SmartLabel program.

The implementation manual will follow a simplified versioning nomenclature to delineate between voluntary and mandatory changes.

- The leading digit will change according to this protocol when a revision includes mandatory changes: **1**.0, **2**.0, **X**.0.
- The secondary digit will change according to this protocol when a revision includes voluntary changes: 1.**1**, 1.**2**, 1.**X**

III. SmartLabel Visual Design

a. The SmartLabel brand

The trademark and public-facing brand play two roles:

1) It provides a standard to discuss and identify the initiative in communication between a wide range of parties — including consumers, retailers, manufacturers, and regulators.
2) It is a cornerstone of the initiative's business model. The initiative will be funded with fees that participating brands pay for the right to use a trademark on package and in a digital environment.

Five principles, grounded in transparency, guide the SmartLabel initiative in all its forms, including the brand, communication collateral, and the website itself.

SmartLabel should be:

- **Credible**: A trustworthy and reliable authority whose motives go unquestioned.
- **Informative**: Simplified information as easily digestible, relevant facts.
- **Comprehensive**: Cover a breadth of products, ingredients, brands, etc. that people interact with daily.
- **Straightforward**: Be clear, consistent, and easy to understand.
- **Approachable**: Align with the everyday consumer in language they understand.

b. SmartLabel Brand Identity

The SmartLabel logo has been updated to reflect its registered trademark status. High-resolution copies of the logo can be found on the portal for brands on www.smartlabel.org. Participating companies can update the logo when appropriate for their business (i.e., when updating website, packaging, etc.).

Visual brand elements

The logo for SmartLabel is designed for use across all internal and external communications. It contains the SmartLabel name as well as a graphic icon and may be used together or individually. The logo was designed to meet the following design objectives:

- Accurately convey the use and application of the program.
- Maintain graphic integrity across multiple media.

The logo is depicted in specific shades of blue and green: blue to signify trust and loyalty and green to signify safety and balance. These colors, and the rounded sans-serif typeface, were selected to make SmartLabel feel approachable and inviting.

The logo also evokes “smart” with the icon denoting smart technology. The bottom right corner of the icon features a simulation of a paper label being peeled back, signifying that SmartLabel provides more information than what is available on pack. It invites consumers to see what is behind the label.

Logo lockups

Vertical logo lockup: The vertical lockup of SmartLabel will always have the icon centered over the logotype at a height of 22.44 pts. In printed applications, it should never be reproduced smaller than 30 pts. When used at small sizes, always use the provided logo file to ensure the legibility of the logo.



Horizontal logo lockup: The horizontal lockup of SmartLabel will always have the icon on the left side of the logotype at 18.9 pts. In printed applications, it should never be reproduced smaller than 15 pts. When used at small sizes, always use the provided logo file to ensure the legibility of the logo.



Color variations of the logo

Depending on the application, the logo may be used in full color process, spot color, grayscale, or single color. **Altering the full color logo is prohibited.**







Pantone P 157-7 C
CMYK: 41, 0, 85, 0
RGB: 161, 206, 87



Pantone P 99-16 C
CMYK: 100, 94, 0, 10
RGB: 36, 51, 138



Pantone Black C
CMYK: 0, 0, 0, 100
RGB: 35, 31, 32

Only use an all-white or black SmartLabel logo against a colored background:





Do not distort the logo



Do not use shadows or other effects



Do not change any of the colors of the logotypes



Do not outline the logotypes



Do not rotate the logotypes or any part of the logotypes



Do not change the size of any part of the logotypes



c. On-pack call-to-action considerations

All on-pack digital triggers used to direct the consumer to a SmartLabel landing page must be accompanied by a SmartLabel logo along with a call-to-action statement. Examples of digital triggers include GTIN barcode, QR code, and digital watermark. The SmartLabel program does not limit the type of digital trigger that can be used on the package label. Today, the most used on-pack digital trigger is the QR code and therefore, many of the below illustrations highlight that use case.

General call-to-action statement

The recommended general call-to-action is: **"Scan here for more information."** This can be customized for the product category. For example, "Scan here for more food information" or "Scan here for more product information".



Use of a bearer bar around outside of the SmartLabel logo and QR code is effective for wide web flexography or printing on corrugated boxes. The bar should not interfere with the quiet zone around the QR code, or it will cause the QR code to be non-conforming and potentially not scannable.

Below are six approved SmartLabel logo and QR code lockups for use on packaging and other materials:













Call-to-action with GTIN barcode

There are two recommended call-to-action options for companies utilizing the GTIN barcode.

1) Instructing the user to access the SmartLabel home page, www.smartlabel.org.
2) Instructing the user to access the information by using the SmartLabel app.

Option 1: SmartLabel home page



Option 2: SmartLabel app





Call-to-action with digital watermark

Brands utilizing a digital watermark to link to their SmartLabel pages **must** use the SmartLabel logo, a combination of a symbol and logotype. One should not be used without the other. Manufacturers have flexibility on where to place the logo with digital watermarking.

A call-to-action, “Scan front with SmartLabel app for more information,” or “Scan [area of interest] with SmartLabel app for more information” is highly recommended and should be located near the SmartLabel logo treatment.



Call-to-action with QR code for Bioengineered Foods (BE) disclosure

Products subject to the National Bioengineered Food Disclosure Standard (NBFDS) should display the appropriate BE disclosure in one of the following locations on the physical label:

1. On the information panel adjacent to the manufacturer/distributor statement,
2. On the principal display panel, or
3. On "an alternate panel likely to be seen by a consumer under ordinary shopping conditions if there is insufficient space to place the disclosure on the information panel or the principal display panel".

For brands using SmartLabel for BE disclosure, the SmartLabel logo and QR code must be used in conjunction with the call-to-action statement. In a May 2020 letter to the American Frozen Food Institute, the USDA indicated that they would allow for a single combined call-to-action statement to convey required on-pack information.

NOTE: USDA requires the call-to-action statement to be placed either above or below the QR code and it cannot be to the side.

Companies using SmartLabel to digitally disclose bioengineered foods must use a call-to-action compliant with the final rule. Examples listed in the final rule include:

- "Scan here for more food information"
- "Scan anywhere on package for more food information"
- "Scan icon for more food information"
- "Scan here for more food information or call [1-000-000-0000]"

The digital link **"must be accompanied by a telephone number that will provide the bioengineered food disclosure to the consumer, regardless of the time of day"**. See examples below.







In addition to these options, equivalent language that reflects technological change is permitted. Alternate options are available for small and very small packages; please refer to the final rule for additional information: https://www.federalregister.gov/d/2018-27283/p-230.

NOTE: In September 2022, a decision was handed down by a federal district court invalidating the portion of the U.S. Department of Agriculture's (USDA's) Agricultural Marketing Service's (AMS's) final rule implementing the National Bioengineered Food Disclosure Standard (BE Rule) that allows for a text message disclosure as an alternative to the electronic/digital link disclosure. The court found the text message option was contrary to the statute's requirement to "provide additional and comparable options to access the bioengineering disclosure", and accordingly unlawful under the Administrative Procedures Act (APA).

All other elements of the final rule, including the definition of bioengineered food and the use of "bioengineered" for the disclosure language, remain valid. Further, in order to minimize disruption to consumers and the food industry, the status quo - which allows for both electronic/digital disclosure and a text message option - will be maintained until AMS revises the final rule consistent with the court decision.

The SmartLabel team will monitor the progress of USDA's rule revision and will provide updated guidance in a future version of this manual.

Call-to-action with digital watermark for BE disclosure

If companies use digital watermarks to comply with the National Bioengineered Food Disclosure Standard (NBFDS), the below illustration is an example of an acceptable call-to-action. "Scan front with SmartLabel app for more food info."

As with QR codes, the digital link **"must be accompanied by a telephone number that will provide the bioengineered food disclosure to the consumer, regardless of the time of day"** in this format: "Call [1-000-000-0000] for more food information". The 800 number must be in close proximity to the link.



The above examples are aligned with the SmartLabel brand office's expectations for a current call-to-action using a watermark. If your company is unsure if a proposed call-to-action will meet these expectations, please contact the brand office.

GS1 US Sunrise 2027: 2D Barcode and SmartLabel

The UPC barcode, or the one-dimensional (1D) barcode, has offered price lookup functionality for decades. However, it's no longer keeping up with today's growing demands for greater product information transparency, traceability, and authentication. In response, the global supply chain is moving toward two-dimensional (2D) barcodes that can carry more information.

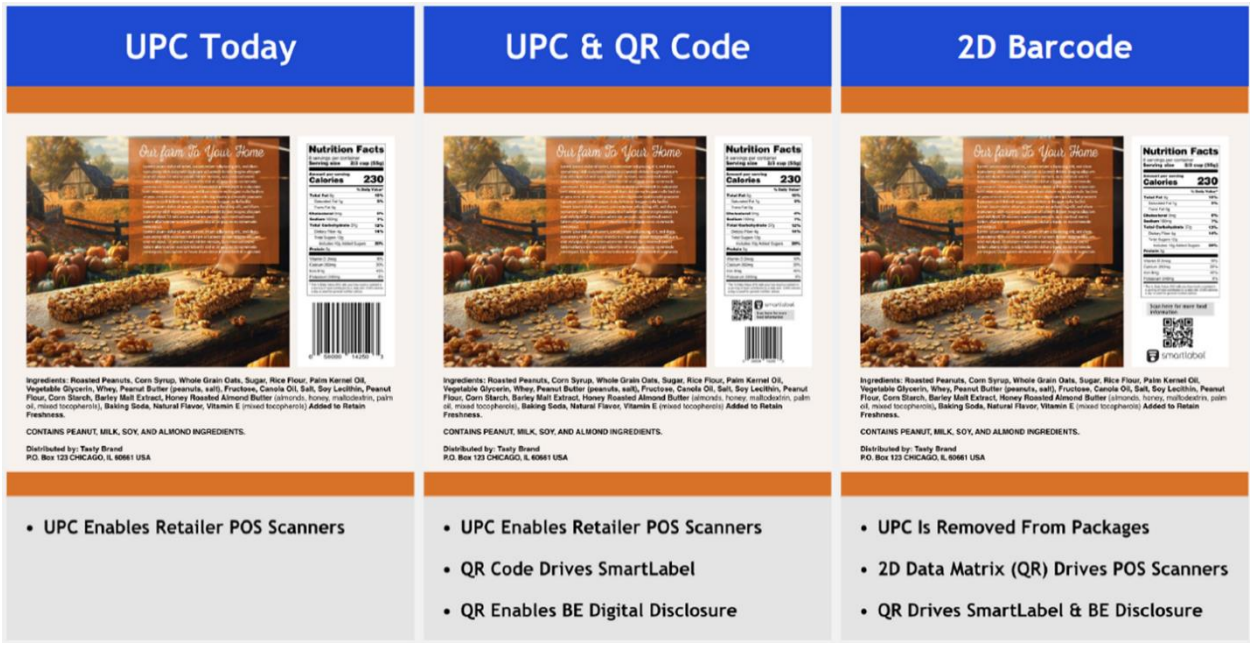
Industry has set a date to start making the transition to 2D barcodes at point-of-sale (POS), referred to as Sunrise 2027. By the end of 2026, retailers will start transitioning their POS systems to be capable of reading 2D barcodes. The shift has already begun with the new technology being tested in 48 countries across the world,

representing 88% of the world's GDP. You can access the global joint industry statement here.

SmartLabel has collaborated with GS1 US to help industry prepare for the transition in to the next generation of barcodes – a 2D QR code also referred to as GS1 Digital Link. For SmartLabel, this presents an enormous opportunity because tens of thousands of products are already using QR codes to communicate product information to consumers. With a single scan on a smartphone, a GS1 Digital Link enabled QR code will allow consumers to access nutritional information, allergens, sustainability and sourcing data on the SmartLabel product page. That same 2D barcode can be scanned at point-of- sale (POS) for price lookup and a variety of other supply chain processes related to inventory management and recall readiness.

2D barcodes allow for a single, standardized way to meet both supply chain needs and evolving consumer requirements. The information carried by 2D barcodes can also help enable:

- Improved inventory management
- Enhanced recall readiness
- Greater sustainability and ethical sourcing
- Better product authentication
- Greater brand trust



GS1 US is helping both supply and demand-side organizations and solution providers get started with a migration path toward the "next dimension" of barcodes. Learn more about how you can prepare your organization and your scanning systems to accept 2D barcodes to help streamline your operations. More information on Sunrise 2027 is available here.

IV. The Landing Page

a. Design Overview

The SmartLabel program entails linking a consumer to a brand-owned responsive web landing page containing information about a specific product. The information on the landing page is specific to one product — a unique item GTIN.

Principles

To ground the design of the SmartLabel digital experience, these key principles are used to benchmark and guide the experience design:

1) The user experience must be fast, easy, and intuitive to navigate, ensuring a positive first trial and repeat usage. It must:
    a. Enable easy access with the fewest clicks to the most relevant information and provide a means to explore more deeply for those who want to do so.
    b. Provide definitions to the extent possible with clear, consumer-friendly terminology to build trust and mitigate confusion.
    c. Organize information in a hierarchy that is easy to navigate, use cues such as color or icons to enable navigation, and ensure consistency in both visual and interactive design across all pages and products.
    d. Scale information to the device, whether a phone, tablet, or a computer. The visual must be easy to read.

2) SmartLabel must meet consumer expectations of transparency to build trust. It must:
    a. Provide the most complete set of factual data possible to enable informed decisions.
    b. Use objective and factual content, visual design, and language to tell an unbiased story.

    NOTE: SmartLabel is not a vehicle for marketing or brand-building; Brand owners will have the ability to provide even more information about their company and their brand portfolio through hyperlinks that take the consumer out of the SmartLabel experience.

    c. Confirm that the information provided is accurate and up to date by including a product image that matches the one in-hand and a notification of the date the information was last checked for accuracy.

b. SmartLabel system structure for landing pages

The building blocks of SmartLabel are five main screen types and a set of modules. Landing pages are comprised of five different screen types:

- Tab
- Lists
- Linked lists
- Paragraph (paragraph lists)
- Modal

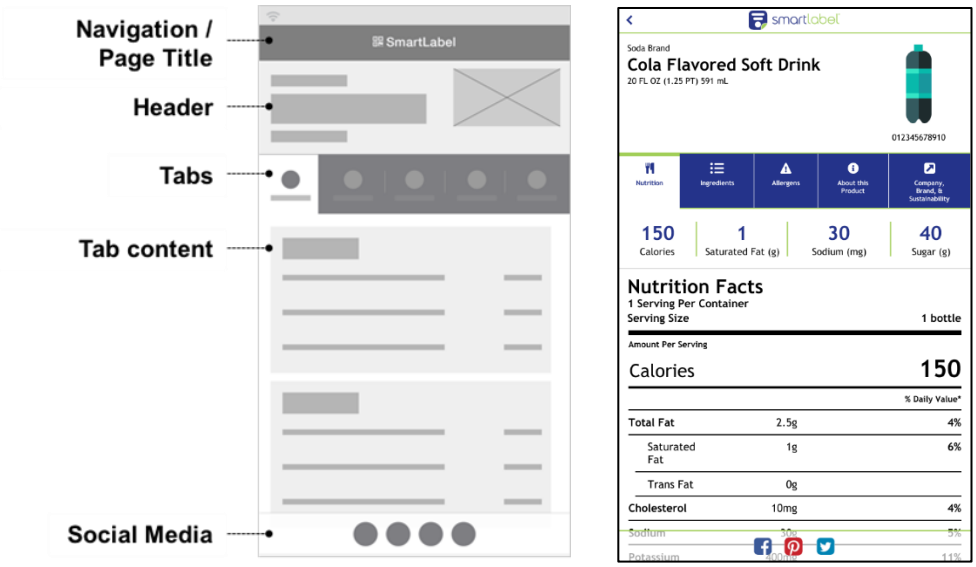
Modules are discreet repeatable elements in SmartLabel. Like screen types, these modules were designed to be flexible and scalable parts of the SmartLabel experience.



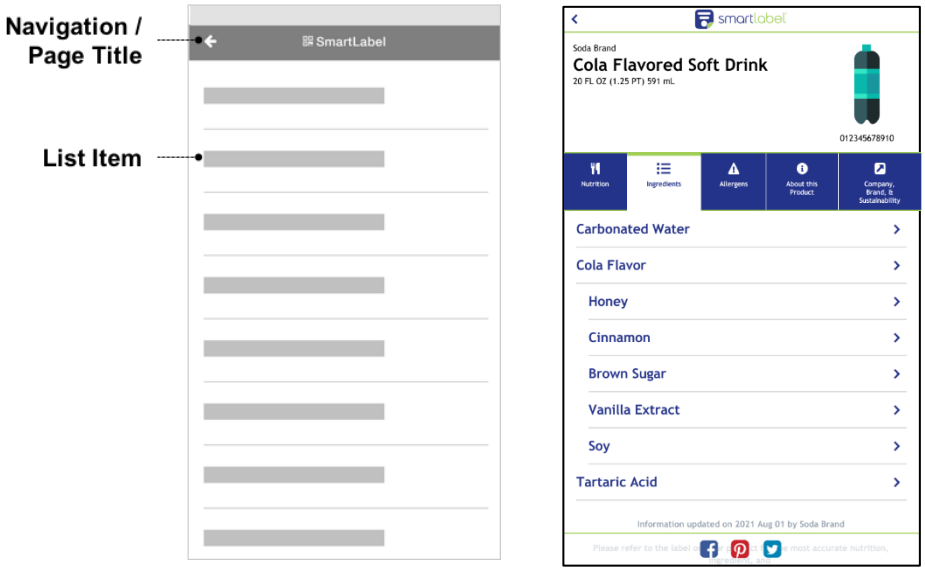
SmartLabel screen type wireframes

These wireframes represent the building blocks of landing pages.

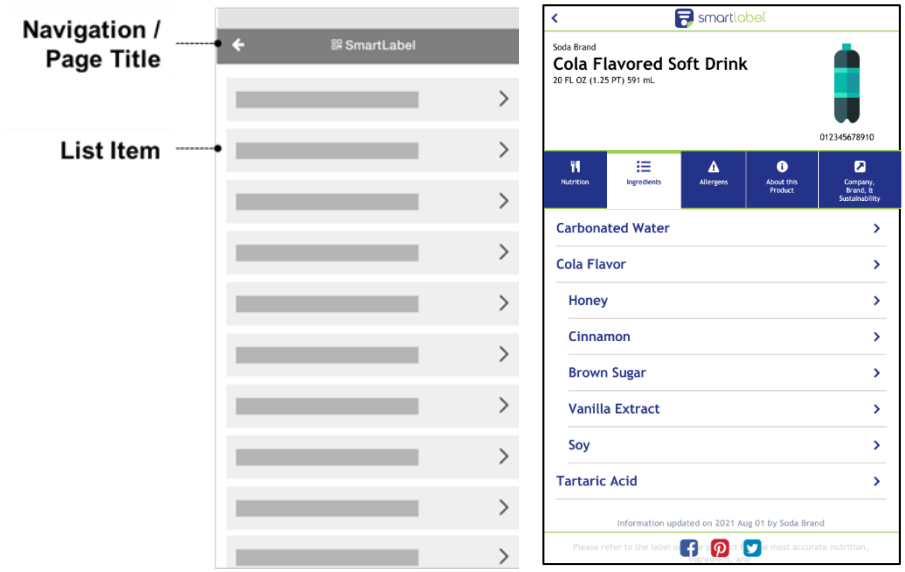
- **Tab** — a unique screen type and layout that exists on the landing page. Content contained within each tab can be laid out using the other screen types.



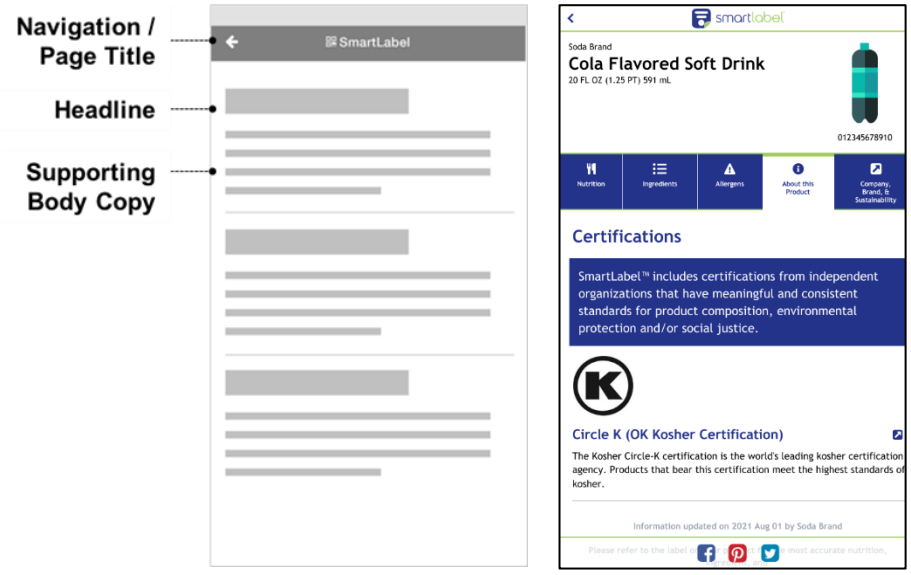
- **List** — a screen type where items are placed in a list but are not clickable. These list items should not be longer than two lines.



- **Linked list** — a screen type where items are put in a list and each item is clickable. Link names should not be longer than two lines. If links are directing a consumer outside the bounds of the product's landing page the modal screen must pop up.

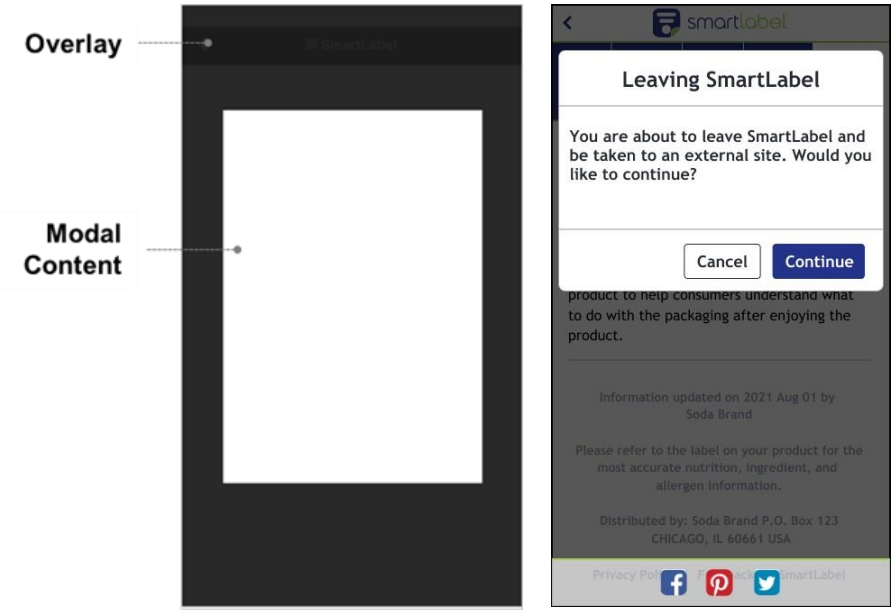


- **Paragraph list** — a layout used for content that includes a headline with supporting content.



- **Modal** – used to display contextual content. It appears over the other content on the page and can have actions (buttons) associated with it.

  The "Leaving SmartLabel" notification must be implemented whenever a link in SmartLabel takes the user to another website. The notification must read "You are about to be taken to an external site. Would you like to continue?" as in the example below.



Typography

Typeface: Trebuchet MS type family.

Regular
abcdefghijklmnopqrstuvwxyz
ABCDEFGHIJKLMNOPQRSTUVWQYZ
1234567890

Italic
abcdefghijklmnopqrstuvwxyz
ABCDEFGHIJKLMNOPQRSTUVWQYZ
1234567890

Bold
abcdefghijklmnopqrstuvwxyz
ABCDEFGHIJKLMNOPQRSTUVWQYZ
1234567890

Bold Italic
abcdefghijklmnopqrstuvwxyz
ABCDEFGHIJKLMNOPQRSTUVWQYZ
1234567890

Type Hierarchy: based on a root font size of 16 px / 1 rem

Headline 1 / List Headline

Trebuchet MS Bold / 28px / 1.75rem / 1.2 line-height

Headline 3

Trebuchet MS Bold / 22px / 1.375rem / 1.2 line-height

SUBHEADLINE

Trebuchet MS / 14px / .875rem / 1.4 line-height

PARAGRAPH 1

Trebuchet MS / 20px / 1.25rem / 1.4 line-height

PARAGRAPH 2

Trebuchet MS / 16px / 1rem / 1.4 line-height

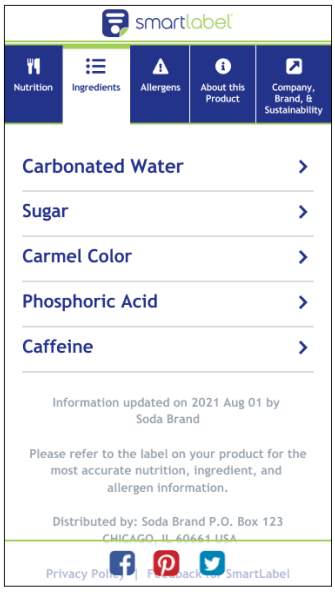
TAB

Trebuchet MS / 11px / .688rem / 1.2 line-height

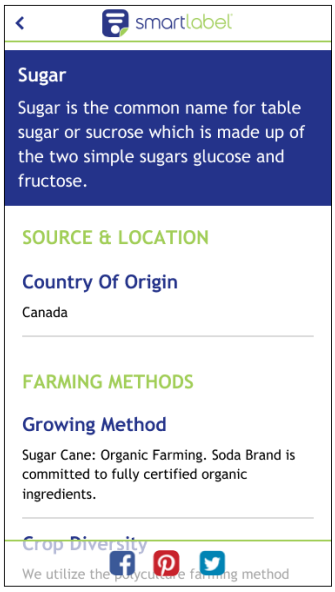
SUBHEADLINE (14px)
HEADLINE 1 (28px)
SUBHEADLINE (14px)
TAB (11px)
HEADLINE 2 (32px)
PARAGRAPH 2 (16px)



HEADLINE 3 (22px)
SUBHEADLINE (14px)



HEADLINE 3 (22px)
PARAGRAPH 1 (20px)
LIST HEADLINE (28px)
HEADLINE 3 (22px)
PARAGRAPH 2 (16px)



HEADLINE 1 (28px)
PARAGRAPH 1 (20px)
HEADLINE 3 (22px)
PARAGRAPH 2 (16px)



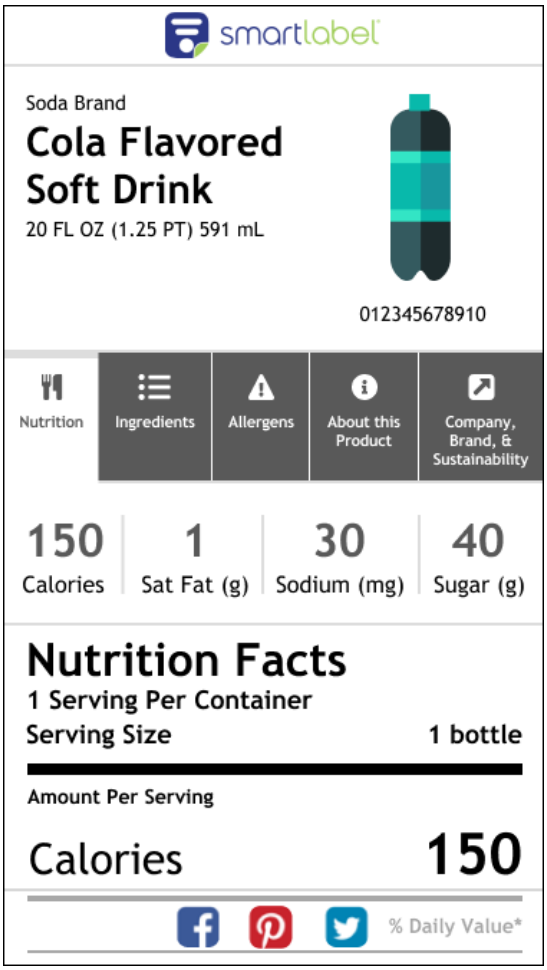
Type color and styling

- Blue type is used as the default color on SmartLabel. All type should be blue unless it is a special case, noted below.
- White type on a blue background is used for paragraphs that are written for emphasis like ingredient definitions and claim descriptions and for the statements at the top of the Allergens tab, and for the Features & Benefits and Certifications subcategories.
- Black type is used for the product description in the header and secondary and tertiary information like definitions of sub-ingredients.
- Green type is used for list headlines and must be styled in all caps. Examples of list headlines include titles for active and non-active ingredients in personal care and household cleaning products.

Neutral color option

For e-commerce and brand website integration only, SmartLabel landing pages and navigation ribbon containing the five tabs that extend across those pages can be rendered in a neutral grey using #595959. The green color can be replaced with #D8D8D8 where it is used decoratively and with #767676 where it is used as a font.

This neutral color scheme meets the Web Content Accessibility Guidelines level AAA 7:1 contrast requirement.



Tab structure

SmartLabel developed the tab structure to optimize the user experience. It also enables consumers to quickly switch between different sections. The landing page has five tabs, and all attributes nest in a hierarchy under each of the five tabs.

The Tabs **must** extend across the landing page and be separated by **white vertical line breaks** between the tabs. The tab that was labeled Features & Benefits in version 2.0 of the SmartLabel Food and Beverage Implementation Manual has been renamed About this Product in version 3.0 of the Food and Beverage Implementation Manual. For food and beverage products, the five tabs working from left to right, are:

- Nutrition
- Ingredients
- Allergens
- About this Product
- Company, Brand & Sustainability



NOTE: All five tabs must be displayed in SmartLabel, even if no information is included under the tab.

How data is displayed in each tab

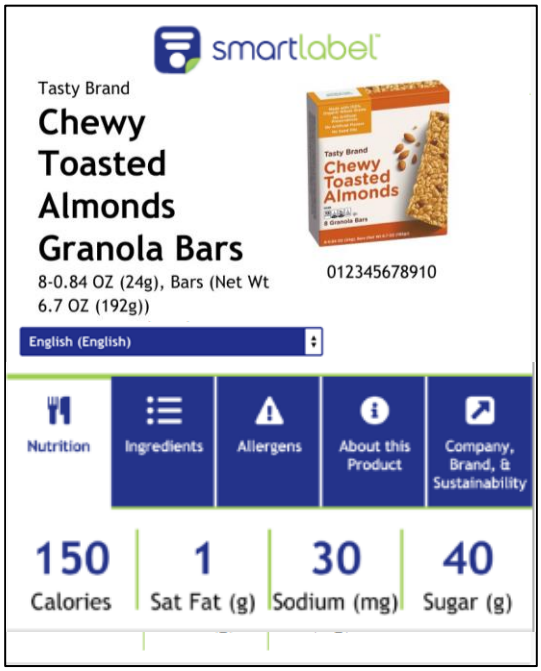
All data attributes (both mandatory and voluntary) are displayed under one of the five tabs. **The display of data attributes must be consistent**. Consumers expect to learn how to use and navigate the tool *and* have that usage experience be consistent across any product they scan. Minor differences can create confusion and mistrust.

NOTE: Refer to the SmartLabel Food and Beverage Attribute List for a complete list of attributes available under each tab.

Guidance on language options

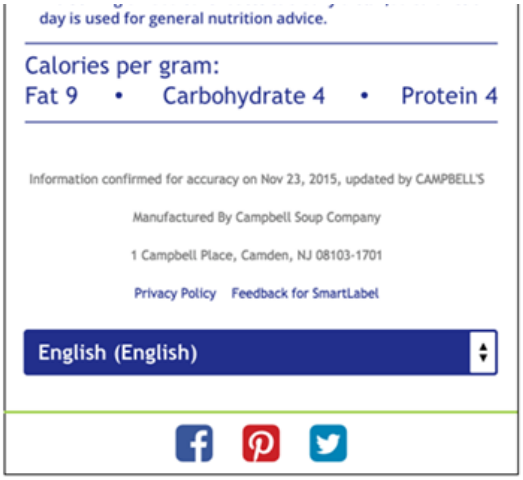
A toggle to access multi-language choices can be in the header or the footer. Participants are encouraged to leverage browser, QR codes and other device capabilities that allow the user to select a default language. Placing the language option in the header is the preferred option. Placing the toggle in the footer works well when using browser technology that defaults to the user's predefined language preference.

Sample header illustration:





Sample footer illustration:





V. Data Attributes and User Experience

a. Overview

A baseline attributes map was first developed using existing attribute definers, including:

- Current US regulatory requirements.
- All existing GS1 attributes, many developed to support European ingredient and nutritional disclosure laws (EU-1169).
- Retailer portals (e.g., Kroger's Program Mercury).
- Data aggregators and collectors (Kwikee, WERCSmart).

Attributes on SmartLabel landing pages are classified into two primary groups:

1) **Required attributes:** For an item GTIN to participate in the SmartLabel program, attributes classified as "required" must be disclosed to the consumer. The overriding principle that will apply to any item participating in SmartLabel is that all attributes required to be available to a consumer based on federal or local law, either on the label or in some other form, is a required SmartLabel attribute.

   As SmartLabel expands across categories or sectors, the list of required attributes may grow. There may be additional attributes that are required to be disclosed under U.S. law.

   NOTE: It is the responsibility of participating brands to ensure that they provide all information required under U.S. law on SmartLabel landing pages. The SmartLabel office should be informed of missing requirements so the attribute lists can be updated.

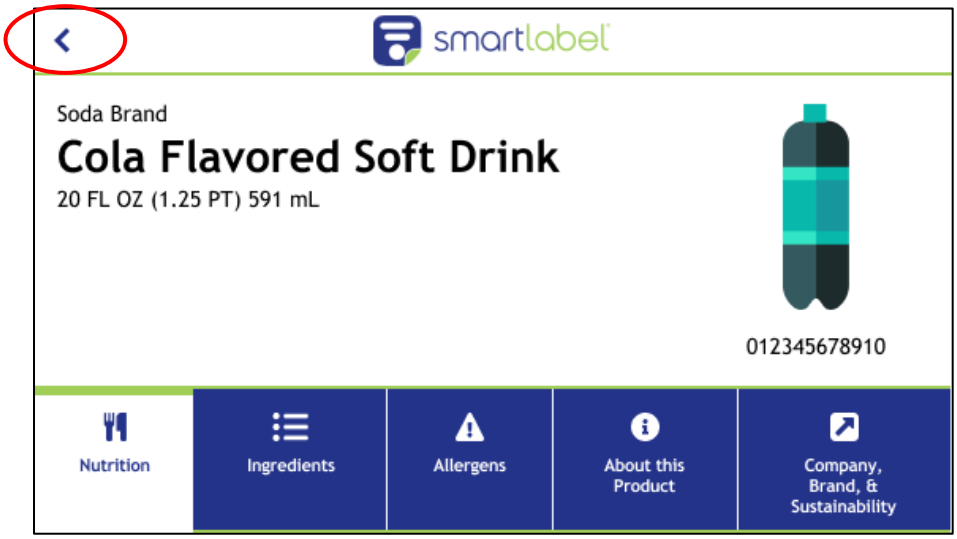
2. **Voluntary attributes:** To maintain a consistent user experience and accurate information across SmartLabel landing pages, voluntary attributes **must** use the GS1 Global Data Dictionary definition. (For a list of required and voluntary attributes, refer to the Attribute List that accompanies this implementation manual.

   In addition to required and voluntary attributes, brands can use hyperlinks to their brand website and company websites to continue to engage with consumers. Hyperlinks throughout SmartLabel can be used to link to third-party certifying organizations, dietary information, and allergen information, for example. When hyperlinks are used, a clear visual cue must be provided that the consumer is leaving the SmartLabel landing page.

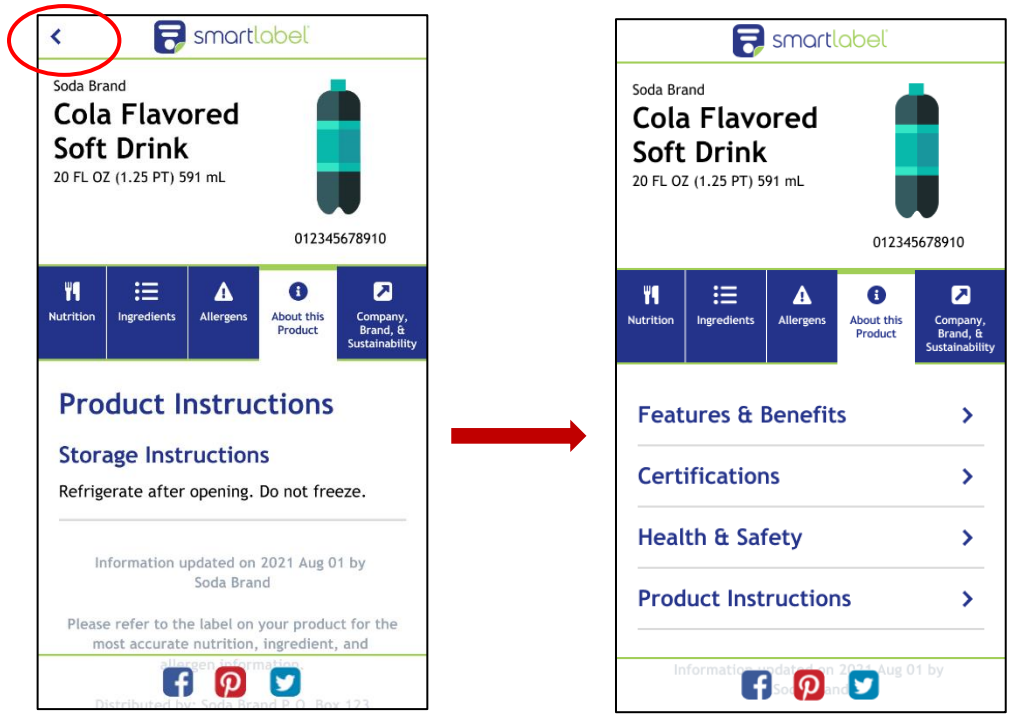
b. Data attribute codes and user experience

Navigation

Using a **navigational back arrow** above the header to indicate returning to a previous page is **required**, as in the example below:



To facilitate navigation between subcategories, the tab must be clickable in Google Chrome, Firefox, Safari and Microsoft Edge, so the consumer does not have to use the browser back arrow.

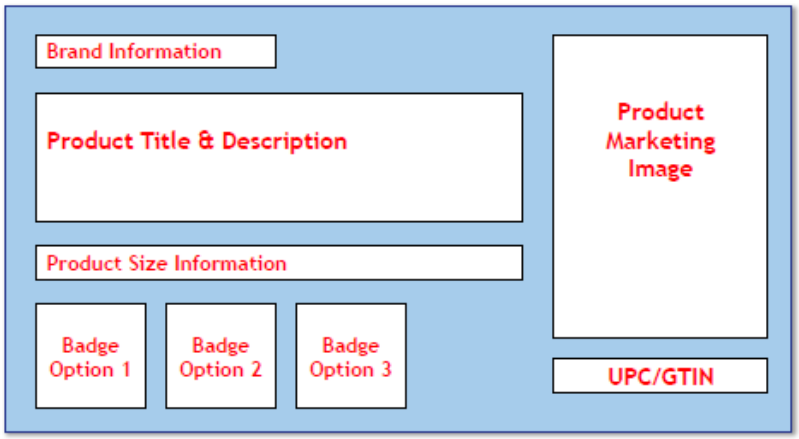


Header (data attribute codes: 1.01-1.23)

At the top of the screen is a header section with basic information about the product. The header **must** include:

1. Marketing image of the product
2. General information about the product (such as the UPC/GTIN, brand, sub-brand, flavor, and product description)
3. Size information (net weight/contents statement)
4. **Federally mandated declarations or text statement, such as BE ingredients, USDA inspection symbols, wild/farmed fish, percentage juice as applicable, Grade A declarations for milk products and alcohol content.** Refer to the Food and Beverage Attribute Sheet for a complete list of required header declarations.
5. Optional badge linking to an iFrame for Certifications

Optional header or footer information includes language options and a variant disclaimer where needed. The header format is depicted below:



Pictured below are two sample executions of a header with and without a BE disclosure symbol.





Product images

Product images are **required** and appear on the right-hand side of the header. The use of alternate or alt text is permitted for product images. Please refer to W3C guidance for recommendations on the use of alternate text: https://www.w3.org/WAI/alt/.



The product image must be clickable to enable a larger view with or without an alternative view (pictured below).

Larger Image Screen





Larger Image Screen w/ alternative views







Alternatively, brands may utilize 360° spin images. To do so, images must meet the following standards:

- Notify the user that there is a 360° image on the landing page by including a 360° icon.
- Include instructions on mobile/tablet and desktop versions indicating how consumers can interact with the spin image and additional standard images on landing pages.



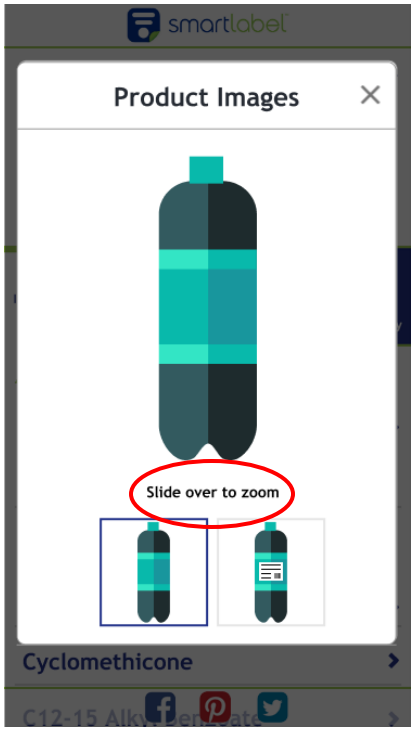


Companies can also add copy or icons to instruct that the image can be clicked to zoom in/enlarge, such as a call-to-action — **"click here to zoom"**— or in the form of an icon like a magnifying glass.





The enlarged product image can be on a separate landing page, either a pop-up or an iFrame, within the SmartLabel landing page. When the image is clicked, additional instructions can be added to direct consumers to slide/scroll over the image to zoom.



Regulatory declarations

Several product attributes tied to federally mandated declarations are located in the header. **These declarations include the bioengineering (BE) declaration, juice content declaration, alcohol content declaration and the USDA grading declaration**. To augment the header declarations, brands have the option to provide an explanation of the BE declaration in the "Features and Benefits" section of the About this Product tab.

NOTE: USDA's Agricultural Marketing Service regulations require Country of Origin Labeling (COOL) and method of production declarations (wild caught and/or farm raised) for covered commodities which includes wild caught and farm raised fish and shellfish. Essentially, the wild caught/farm raised labeling applies to fresh/frozen fish filets and shrimp, but not prepackaged, processed, canned fish and shellfish products.

FDA regulated alcoholic beverages

For alcoholic beverages subject to the labeling jurisdiction of FDA, an alcohol content declaration, matching the one found on the physical label of the product, is required for disclosure on the header portion of the landing page. *Federal regulations require the alcohol content to appear on the labels of flavored malt beverages that derive alcohol from added flavors. However, some state laws have their own requirements with regard to alcohol content statements.*

BE disclosure

If a brand is using on-pack disclosure to meet federal BE disclosure requirements, SmartLabel pages for products bearing on-pack disclosure must also disclose that product's BE status.

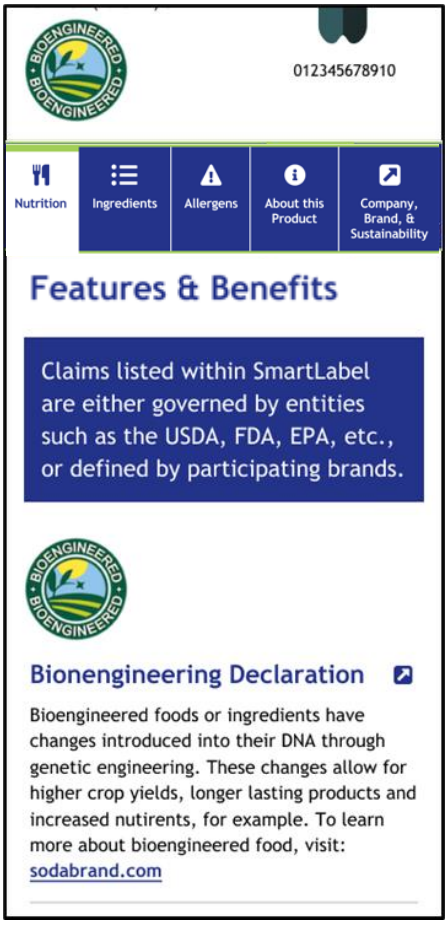
Landing pages disclosing a product's BE contents can utilize text or a symbol as defined by the USDA. It is recommended and a best practice that the BE text or symbol be linked to a declaration explanation. To do so, clicking the disclosure symbol or text will take the user to the "Features & Benefits" section of the About this Product tab, where they can view the explanation.

The digital or electronic link disclosure must also:

- Appear without any "marketing or promotional material" on the product information page. The rule defines "marketing or promotional material" as information used "to assist in the sale or promotion of a product."

- Avoid the sale, collection, or analysis of any personally identifiable information about users or the devices used to access the platform. If such information must be collected to carry out the purposes of the rule, the information must be deleted immediately and not used for any other purpose.





The SmartLabel office has created the following copy to serve as a starting point for brands to explains bioengineering to consumers:

"Bioengineered foods or ingredients have changes introduced into their DNA through genetic engineering. These changes allow for higher crop yields, longer lasting products, and increased nutrients, for example. To learn more about bioengineered food, visit: [insert your brand or company's URL]."

Brands are encouraged to modify this copy in any manner that resonates with their consumers. A statement must be included indicating the brand owner is the source of the information.

Voluntary BE Disclosure

Manufacturers of foods or food ingredients that do not meet the definition of bioengineered food and that are derived from a food on the List of Bioengineered Foods may disclose such foods with the Derived From Bioengineering symbol:

The symbol must be placed in the header as illustrated below:



It is recommended and a best practice that the Derived from Bioengineering text or symbol be linked to a declaration explanation. To do so, clicking the disclosure symbol or text will take the user to the "Features & Benefits" section of the About this Product tab, where they can view the explanation.

The SmartLabel office has created the following copy to serve as a starting point for brands to explains bioengineering to consumers:

"This product contains ingredients that are derived from bioengineered foods. Bioengineered foods or ingredients have changes introduced into their DNA through genetic engineering. These changes allow for higher crop yields, longer lasting products, and increased nutrients, for example. To learn more about bioengineered food, visit: [insert your brand or company's URL]."

Brands are encouraged to modify this copy in any manner that resonates with their consumers. A statement must be included indicating the brand owner is the source of the information.

SmartLabel BE disclosure image guidelines

Placement and sizing of the BE disclosure in the header **must** not supersede the main product image. The current main product image is slightly larger than approximately one-third of the screen width on average mobile device screens. It is recommended that the BE disclosure logo image be approximately two-thirds the size of the main product image

A recommended guideline for an average screen size width of 375px includes:

- A 140px square main product image, and
- A 90px square BE disclosure image

Unlike the product image, which typically has built-in white space around it, additional space should be given around the disclosure logo. Placing the logo centered within a 125px area (one-third of the average sized page) is recommended.





Additional header disclosure image guidelines

Additional logo images in the header may be required to comply with future regulatory disclosures. By following the above recommendations, multiple logos will be given ample space for legibility and discoverability. To maintain proper hierarchy for each logo, the logo area should respond by breaking into a new line below the UPC and basic product information.

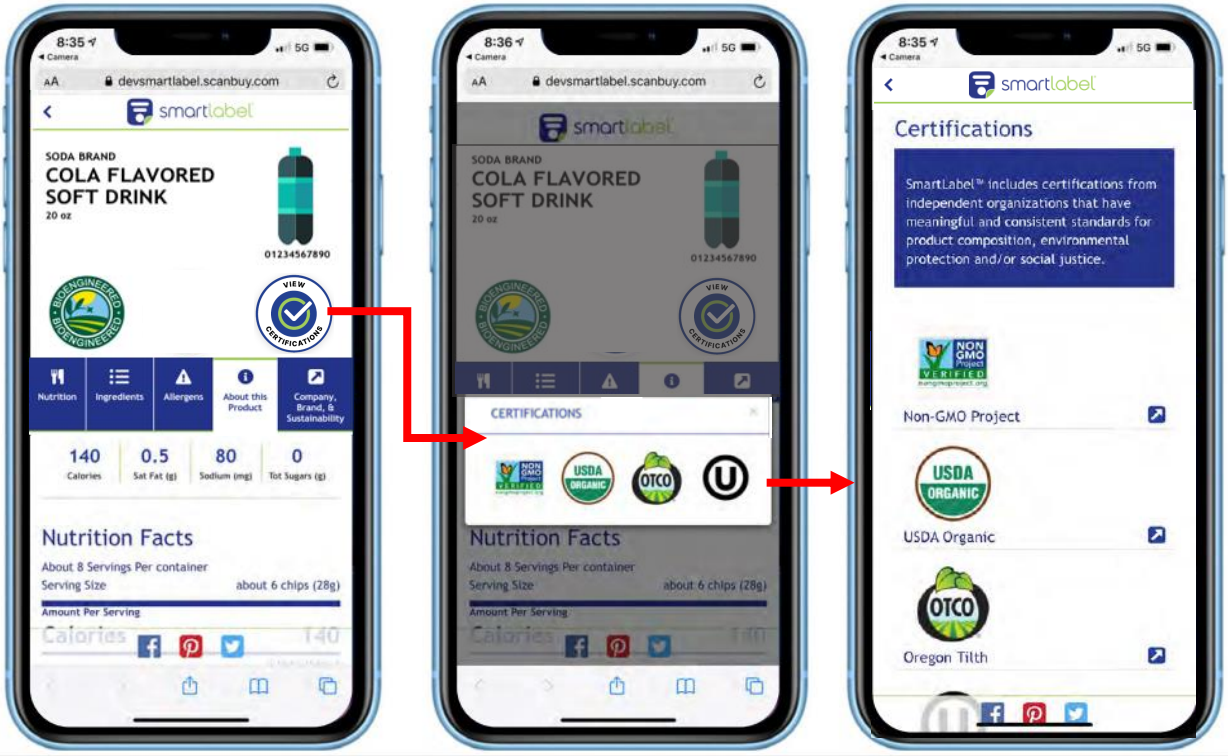


Certifications Badge

On a voluntary basis, brands that wish to highlight their third-party product certifications may place the certification badge depicted below in the header, indicating to the consumer that the badge can be clicked to display more information.



The badge **must** be placed on the far right side of the header below the product image and GTIN as illustrated below.

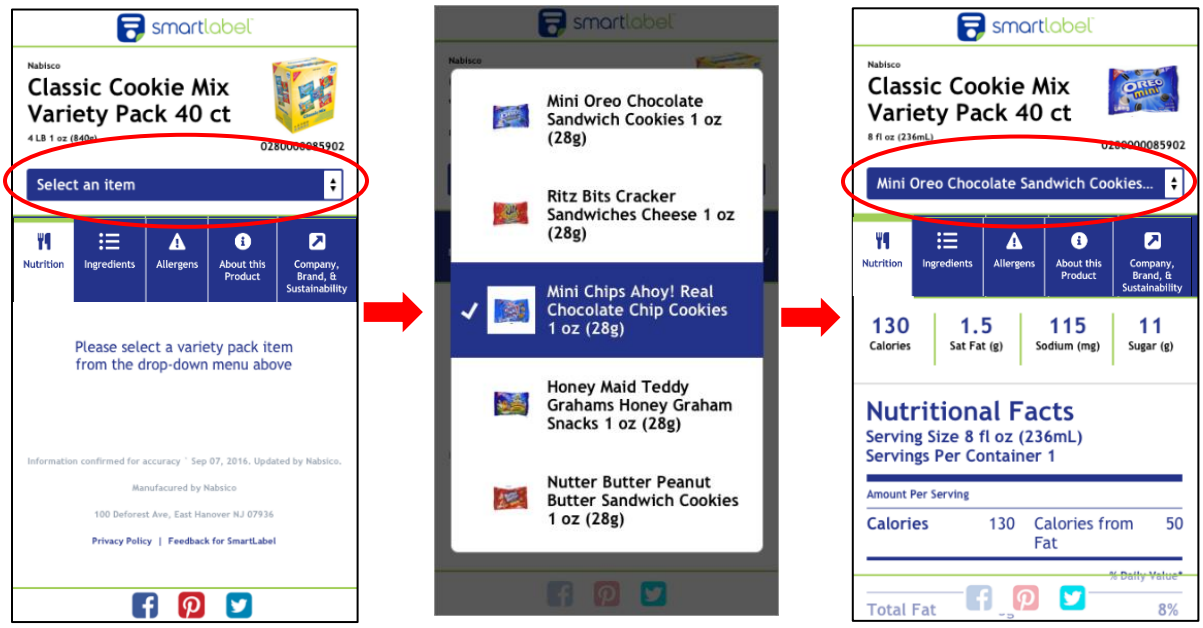


When the consumer clicks on any of the certification badge, it triggers an iFrame that displays the product certification symbols as in the example below. The certification symbols can be linked to additional information about the certifications on the About this Product tab. Refer to the Certifications section of this manual for more information.

NOTE: The Certifications badge must be used exclusively for third-party certifications. Image files for the badge can be accessed in the portal for brands on www.smartlabel.org.

Special case – variety packs

Variety packs are a unique case in which the consumer will need access to more than one type of product. To support this, the following entry screen execution may be used to help users navigate to the desired product.



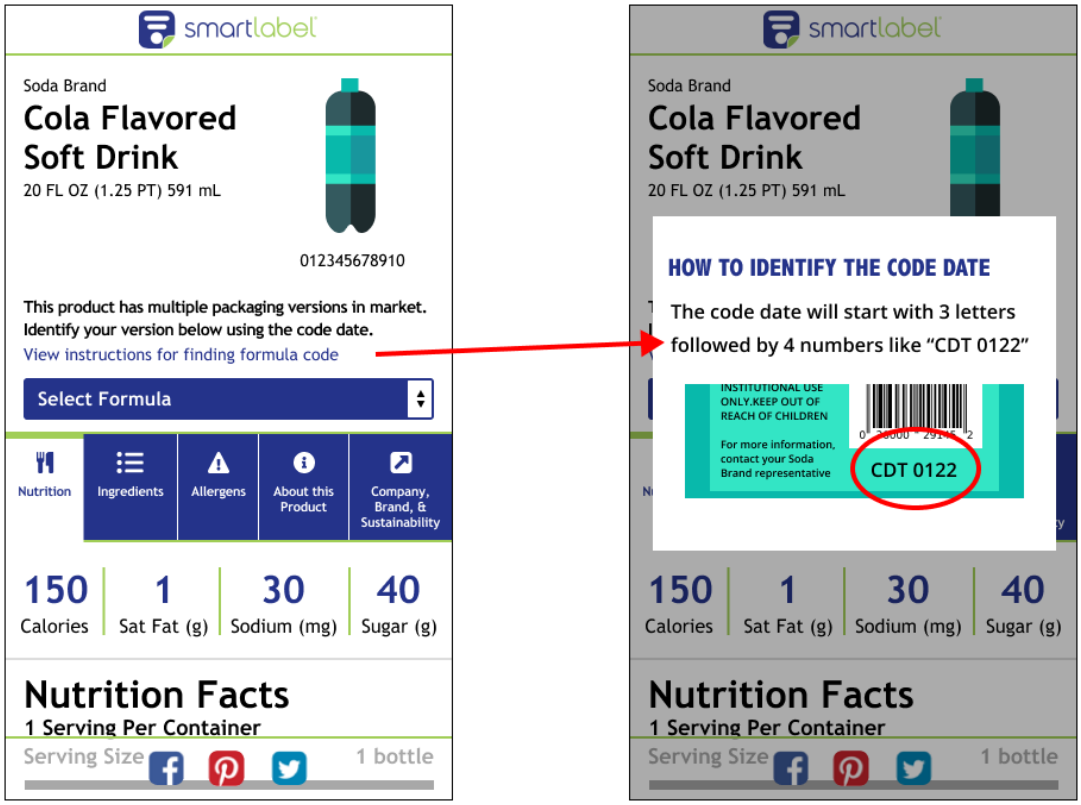
Special case – identifying variants for GTIN specific landing pages

There are two additional options to help consumers identify a particular variant of a product within a GTIN specific landing page.

Variant Menu Page

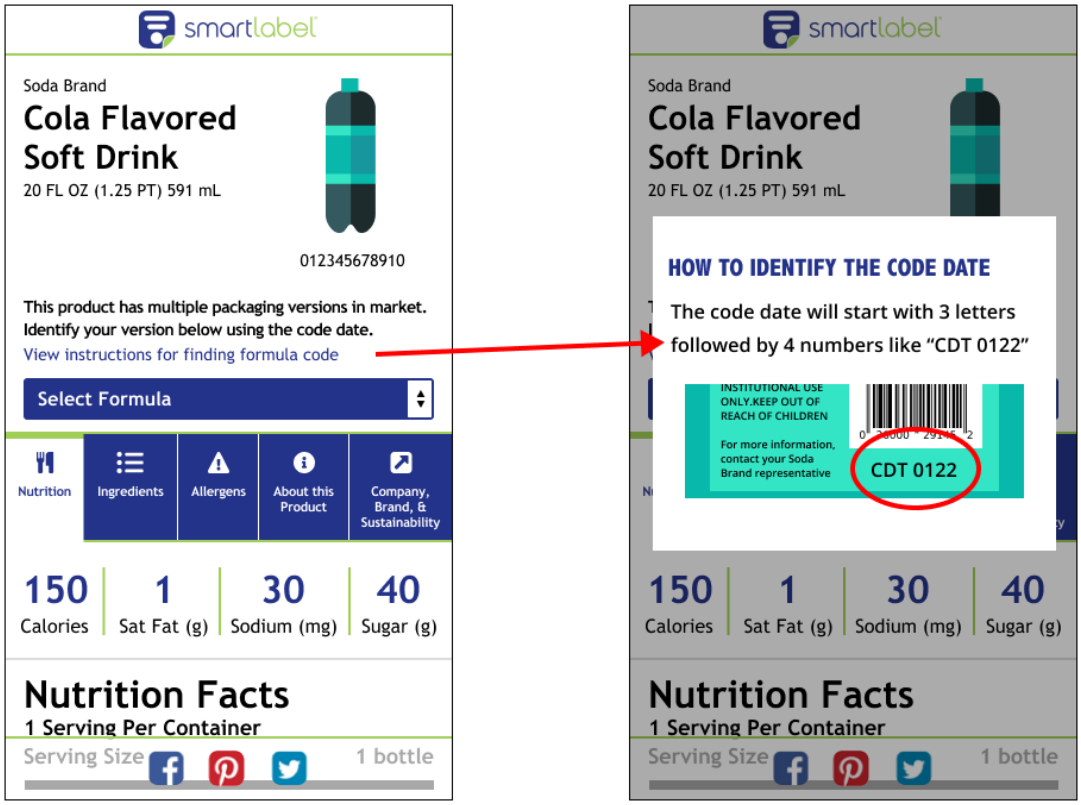
The first option is to build a variant menu page. This is an entry page so the user can choose the desired product. The header mirrors the SmartLabel landing page, but at the bottom of the header there is brief description of why the consumer is choosing between products and a link to instructions on how they can identify the correct product.

This instruction redirects the consumer to another landing page, either a pop-up window or an iFrame, within SmartLabel. The body of the variant menu lists the variants and a unique identifier, so the consumer can choose the correct product.



Variant Dropdown Menu

In the second option, instead of an entry landing page, the selection of the variant is within the SmartLabel landing page. Below the SmartLabel product header, there is a brief description of why the consumer is choosing between products and a link to instructions on how they can identify the correct product. Beneath the link is a dropdown menu, where the consumer is able to select the product they have in hand.



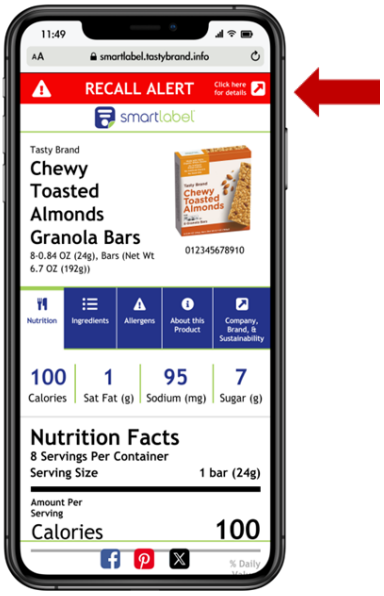
This instruction link redirects the consumer to another landing page — either a pop-up window or an iFrame — within the SmartLabel landing page. The variant dropdown menu lists the variants and a unique identifier, so consumers can find the product they need.

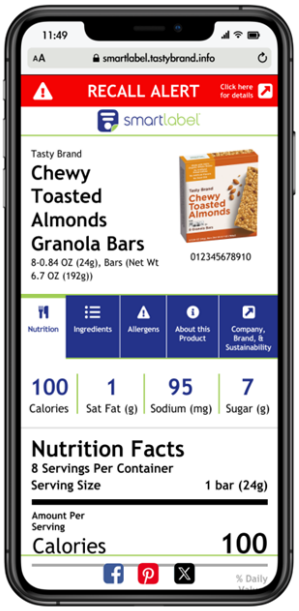
Special case — product recall alert banner

The product recall banner **must only be used to notify the consumer of alerts and direct them to a brand-owned website** where they can learn more about the product in question. This allows participating brands to ensure consumers have access to the most recent and updated information.

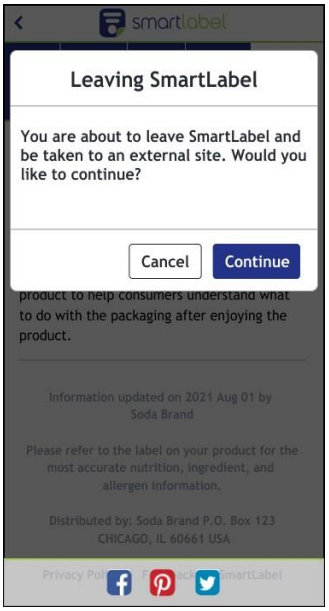
Brands can use the following options when naming the alert banner: recall alert, recall notification, limited recall notification or voluntary withdrawal.







User clicks on the red banner* to activate a modal window and learn about the recall alert in more detail.



Modal window alerts user that they are leaving SmartLabel and being redirected to a brand owned site.



Brand owned landing page is displayed that contains relevant product recall information

Red Banner Color:
Red: 244
Green: 0
Blue: 0
Hex: #F40000

Footer (data attribute codes: 2.01-2.09)

The bottom of the screen **must** contain a footer section with information in the following order:

1. **Optional:** Statement instructing the consumer to refer to the product packaging for the most up-to-date product information.

2. **Required**: Date of updates to the landing page: "Information updated on [Date] by [Company Name]. The timestamp must follow the DD-MMM-YYYY format.

3. **Required**: Manufactured by statement: "Manufactured by [Company]" and/or

4. **Required**: Distributed by statement: "Distributed by [Company], [Company Address]

5. **Required: Company Privacy Policy and Feedback for SmartLabel links on one line. The Privacy Policy must link to the company's privacy policy. The Feedback for SmartLabel prompt must link to the Contact Form on www.smartlabel.org.**

6. **Optional:** Social media icons with links to the company's social media platforms. Social media links should allow the user to share the landing page on their own social media platforms. Companies looking to provide consumers with their branded social media links should utilize the company, brand & sustainability tab for this outreach.

Optional header or footer information includes language capabilities and a variant disclaimer where needed.



Nutrition tab (data attribute codes: 3.01-3.25)

The Nutrition Panel in SmartLabel **must** conform to the 2016 FDA changes to the Nutrition Facts Label on the physical package.

Facts Up Front

At the top of the Nutrition tab, data for four primary **Facts Up Front must** be displayed first in the same order as they appear on packaging: calories, saturated fat, sodium, and sugar.

Since the landing page is not constrained by package size**, all four of the Facts Up Front attributes must be displayed even if the value is zero.**

NOTE: Effective January 1, 2026, Added Sugar will replace Total Sugar in Facts up Front on product packaging and in SmartLabel. This is a requirement.

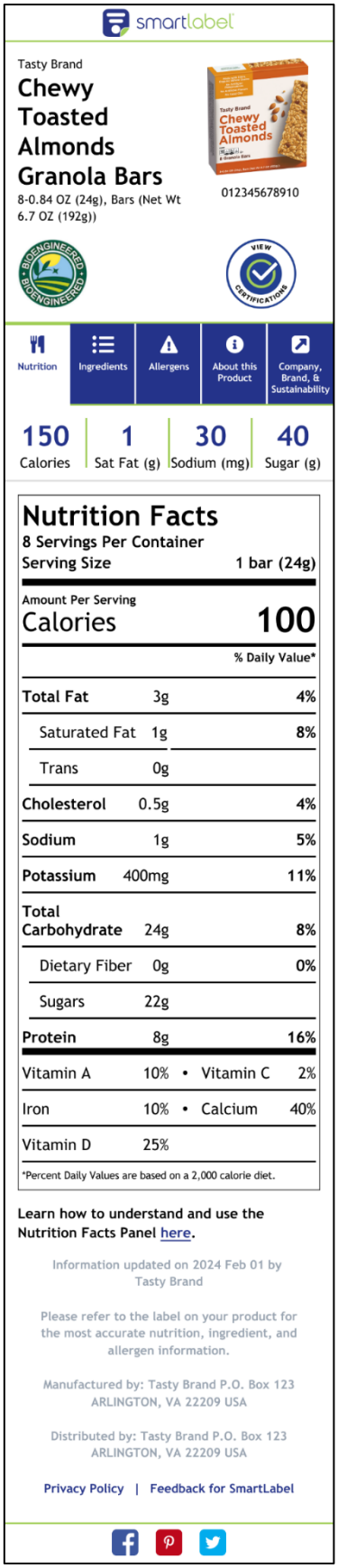
It is acknowledged that phasing in the presentation of updated FUF icons on the labels of all eligible food products will take some time to complete, particularly with persistent supply chain pressures. We encourage companies to update packaging and SmartLabel pages as they update labels but no later than the January 1, 2026, uniform compliance date for final food labeling regulations.

Nutrition Panel

The Nutrition Panel in SmartLabel must conform to the FDA Nutrition Facts Label requirements and include:

- Serving Size
- Number of Servings per Container
- Calories per Serving
- Quantity of nutrients
- Percent of Daily Value

The Nutrition Panel must exactly mirror what appears on the physical package for single column displays. "Exactly" refers to all elements of the FDA's Nutrition Facts Label design including relative font sizes, indentations, alignment, and separation bar-width. The Nutrition tab is not constrained by package size so the Nutrition Facts Panel should follow the FDA guidelines without truncation.



Simplified Nutrition Panel

When a food product contains insignificant amounts of eight or more of Calories, total fat, saturated fat, *trans* fat, cholesterol, sodium, total carbohydrate, dietary fiber, total sugars, added sugars, protein, Vitamin D, calcium, iron and potassium, the **Simplified Nutrition Panel** may be used on the physical package and in SmartLabel.

More information on the simplified Nutrition Panel can be found in the Federal Register (21CFR 101.9(f), which defines "insignificant amount" as "that amount that allows a declaration of zero in nutrition labeling, except that for total carbohydrate, dietary fiber, and protein, it shall be an amount that allows a declaration of "less than 1 gram."

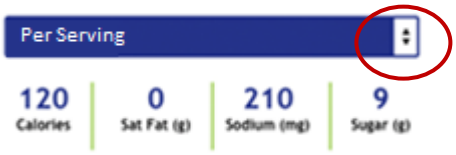
"If any nutrients are declared as part of the simplified format or if any nutrition claims are made on the label or in labeling, the statement "Not a significant source of _____" (with the blank filled in with the name(s) of any nutrient(s) identified in paragraph (f) of this section that are present in insignificant amounts) **shall be** included at the bottom of the nutrition label."



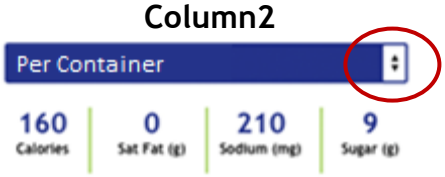
The Simplified Nutrition Panel in SmartLabel must exactly mirror the label on the physical package.

For **multiple column displays**, it is recommended that brands choose to exactly mirror the supplements facts panel on the physical package, including use of a dual or multiple column format, where technology allows. If this is not possible, a brand may instead use the blue selector bar option:

Column 1



Column2





Nutrition Facts

2 servings per container

Serving size **1 cup (255g)**

	Per serving		Per container	
Calories	**220**		**440**	
		% DV*		**% DV***
Total Fat	5g	**6%**	10g	**13%**
Saturated Fat	2g	**10%**	4g	**20%**
Trans Fat	0g		0g	
Cholesterol	15mg	**5%**	30mg	**10%**
Sodium	240mg	**10%**	480mg	**21%**
Total Carb.	35g	**13%**	70g	**25%**
Dietary Fiber	6g	**21%**	12g	**43%**
Total Sugars	7g		14g	
Incl. Added Sugars	4g	**8%**	8g	**16%**
Protein	9g		18g	
Vitamin D	5mcg	25%	10mcg	50%
Calcium	200mg	15%	400mg	30%
Iron	1mg	6%	2mg	10%
Potassium	470mg	10%	940mg	20%

* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

Exempt Products

Products like herbs and spices and coffee are not required to display a Nutrition Facts Panel. For exempt products, place this authorized language on the Nutrition Tab:

In accordance with FDA/USDA, nutrition labeling is not mandatory for this product but some companies may display it voluntarily. Additional nutrition information may be available on the USDA Food Data Central website or please see the Company/Brand tab for contact information to obtain nutrition information.

See the example below.



FDA Interactive Nutrition Facts Panel

To educate consumers and provide an opportunity for engagement, the SmartLabel program recommends that brands place a link on the Nutrition tab to FDA's interactive Nutrition Facts Panel (NFP), which explains how to understand and use the NFP. It is recommended that the link be prominently placed on the tab below the NFP as in the example below:



Learn how to understand and use the Nutrition Facts Panel here.

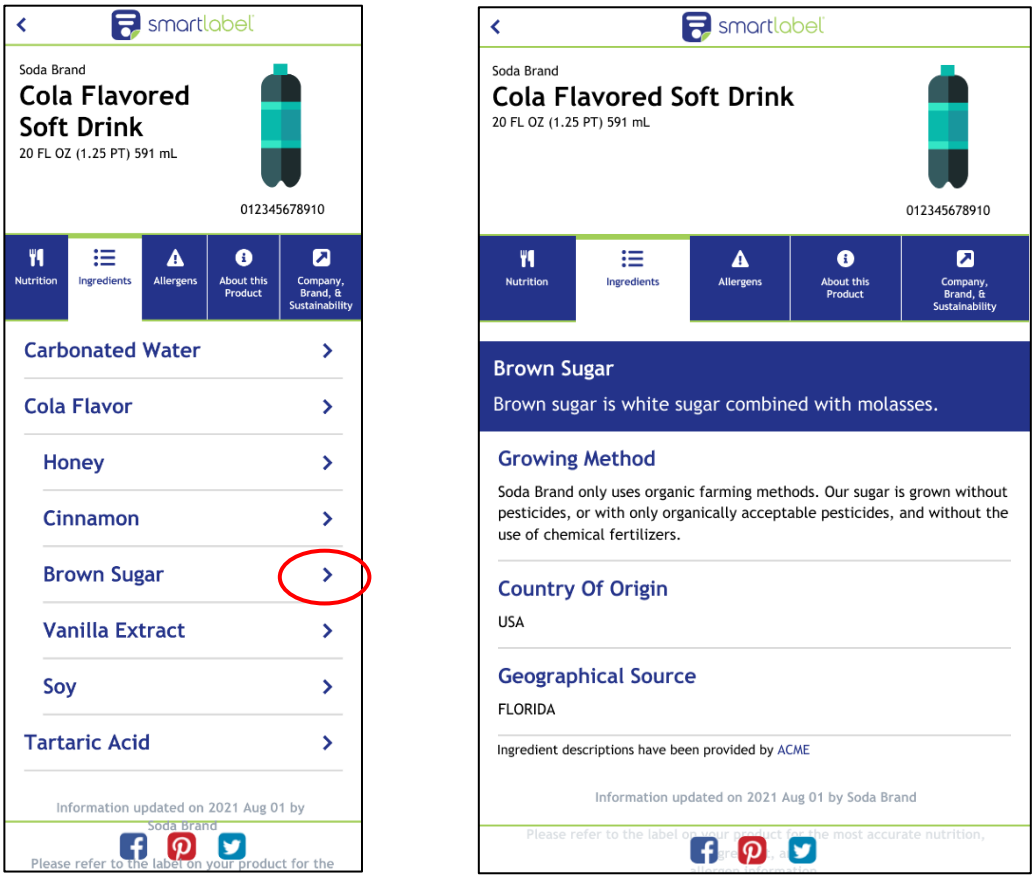
For more general information on the new Nutrition Facts Panel, the FDA provides guidance **here**.

Ingredients tab (data attribute codes: 4.01-4.18

Under the ingredients tab, ingredients must appear in a stacked list. This list, and the order in which the ingredients are listed, must mirror the ingredient list on the package and comply with FDA regulations.

If the product contains a **multi-component ingredient** shown by a parenthetical listing on the label (as defined by 21 CFR 101.4(b)(2)(i)), those ingredients **must** be indented and listed in descending order of predominance. Sample illustration below.

If the brand chooses to display the ingredient definition (voluntary and recommended), an arrow must be placed on the right side of the ingredient that links to an additional page with the ingredient definition:



When a voluntary attribute with customized text (like plain language descriptions) is displayed, the notification **"definition provided by [definition provider]" must be included,** as in the example above. When links are provided to other resources, there must be a **"leaving SmartLabel"** notification.

NOTE: "Does not contain" or "Free from" statements must be placed under the "Features & Benefits" subcategory of the About this Product tab.

Requirements for CBD products

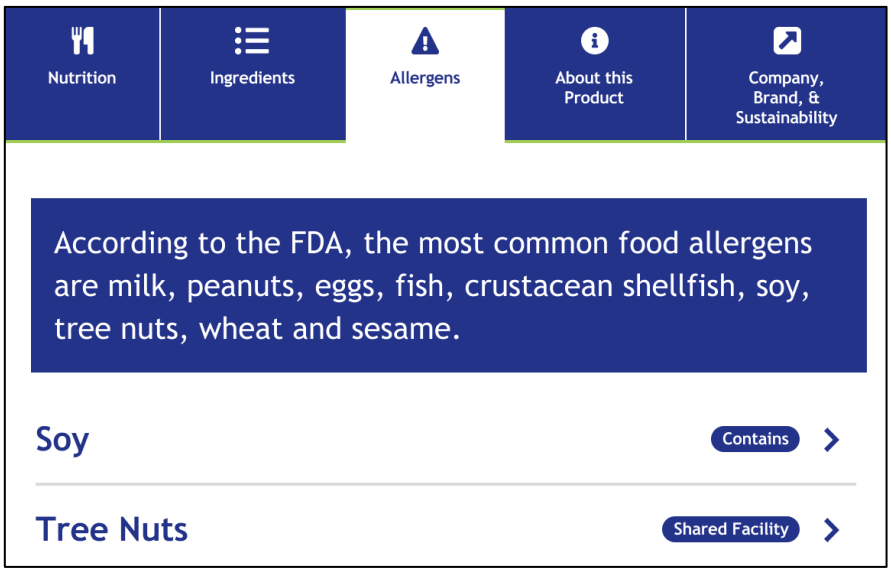
SmartLabel **requires** that products containing cannabidiol (CBD) provide ingredient definitions. As with all ingredient definitions, the statement, **"definition provided by [definition provider]", must be included (as in example above)**. When links are provided to other resources, there must be a **"leaving SmartLabel"** notification.

Allergens tab (data attribute codes: 5.01-5.23)

On April 23, 2021, the Food Allergy Safety, Treatment, Education, and Research (FASTER) Act was signed into law, declaring sesame as the 9th major food allergen recognized by the United States. This change became effective on **January 1, 2023**.

This section is used to disclose the top nine allergens identified by the FDA. **"Allergen free" statements must be placed under the Features & Benefits section of the About this Product Tab.**

At the top of the Allergens tab is **required fixed** copy that reads, "According to the FDA, the most common food allergens are milk, peanuts, eggs, fish, crustacean shellfish, soy, tree nuts, wheat and sesame." See sample illustration below.

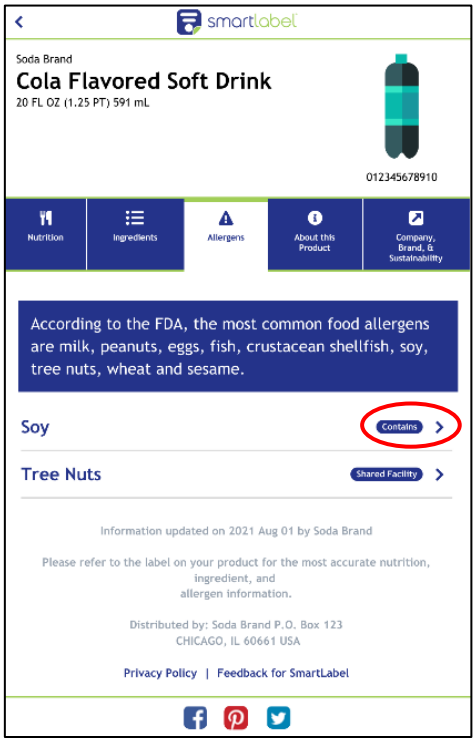


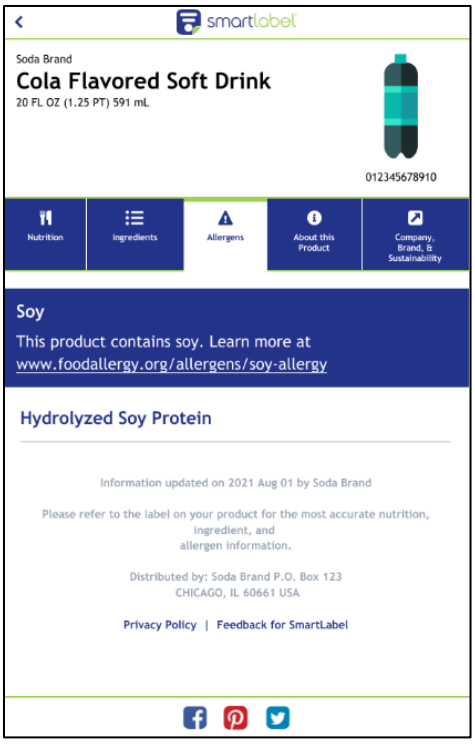
All allergens in the product ingredients must be listed in a stacked format.

- **Blue ovals placed just before the linked arrows must be displayed** to inform the consumer if the product **"Contains"** or **"May Contain"** the common allergen. If "May Contain" is used, we recommend adding an optional explanation.

- If the brand also has an allergen disclosure statement on its package relating to production equipment or facilities, those disclosures may be listed here as well. In that instance, the oval to the right of the allergen will read either "**Shared Equipment**" or "**Shared Facility**".

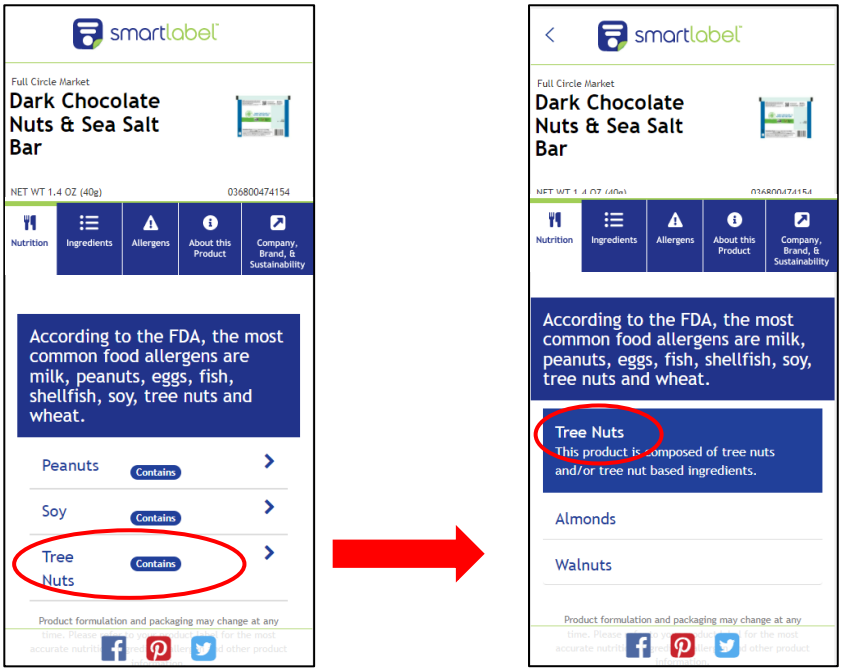
- **Arrows** to the right of the ovals **must** link to an additional page with an explanation of the allergen disclosure, as in the example below.





- Brands may also choose to add a link to the Food Allergy Research & Education (FARE) website to provide the consumer with more information about the allergen, as in the blue bar on the example above.

NOTE: For products that contain fish, shellfish, or tree nuts, the species of fish and crustacean shellfish, as well as the type of tree nut, must be displayed in a linked page. Click here for more information.

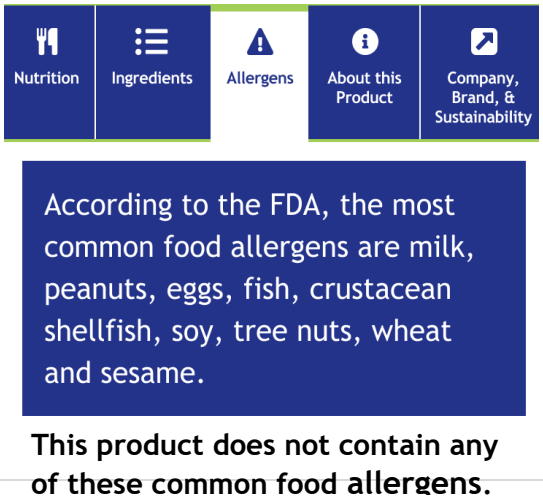


Optional attributes for possible allergens beyond the top nine should be listed below the common top allergens.

When a voluntary attribute with customized text (like plain language descriptions) is displayed, the notification **"definition provided by [definition provider] must be included.**

When links are provided to other resources, there must be a **"leaving SmartLabel"** notification.

If none of the major allergens are present in the product, the text **must** read, **"This product does not contain any of these common food allergens."** and no stacked bars will be displayed. **The fixed copy containing the statement about the major allergens must remain on the page.**



NOTE: "Allergen free" statements and claims must be placed under the "Features & Benefits" sub-category of the About this Product tab.

FDA has not formally defined the term "free" as it relates to allergens. The agency's general position is that when the term "free" has not been defined by regulation, it conveys the product contains zero or "no detectable levels" of the relevant substance.

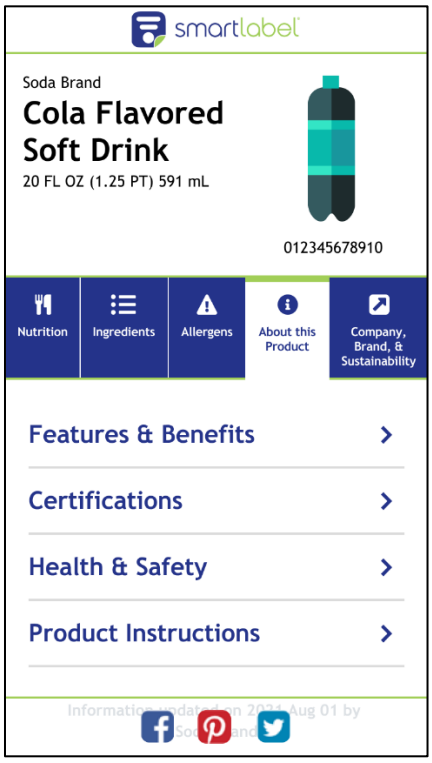
FDA is of the view that to substantiate a free from claim, a company would need to use a test method that has been specifically developed to detect and quantify low levels of the relevant substance, and that has been validated at multiple labs.

About this Product tab (data attribute codes: 10.01-14.13)

The About this Product tab takes the place of the "Features & Benefits" tab. This tab has four sections, displayed in stacked horizontal bars shown in the order seen below:

- Features & Benefits
- Certifications
- Health & Safety
- Product Instructions

Many of the attributes in this tab are voluntary. If a company is not disclosing any voluntary attributes under one of these sections, that section header will not appear.



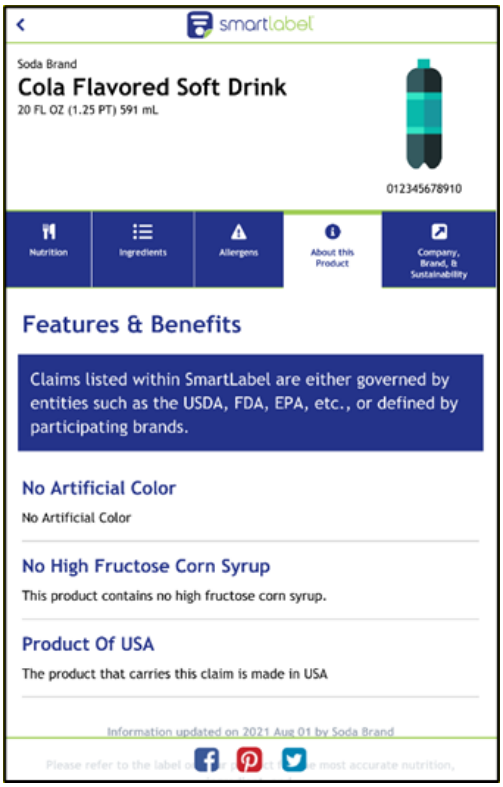
Features & Benefits (data attribute codes: 10.01-10.87)

This section contains voluntary attributes pertaining to nutrient content claims, ingredient absence statements, compositional claims, country of origin statements, method of production, growing methods, and so on. Refer to the Food and Beverage Attribute List for a complete set of attributes that can be displayed under this category.

At the top of the Features & Benefits section, the **required fixed copy** reads: "Claims listed within SmartLabel are either governed by entities such as the USDA, FDA, EPA, etc., or defined by participating brands."

If the claim definition is not governed by one of these agencies, and the brand provides its own definition, the **"definition provided by [definition provider]"** note must be included.

All claims are voluntary attributes and will be displayed in an **alphabetical list**:



Refer to the **Food and Beverage Attribute List** for allowed voluntary claims a brand may choose to display. They include compositional claims (100% whole grain), nutrient content claims (good source of protein), presence or absence claims (no artificial colors), and others.

BE explanation

Brands choosing to provide a voluntary explanation of the BE text or symbol declaration in the landing page header **must** place the explanation under Features & Benefits and hyperlink to the declaration text or symbol.

Information contained on landing pages may be subject to regulation for labeling and advertising under federal and state law, including laws and regulations administered by the FDA, USDA, EPA, and FTC. **Participating brands are responsible for ensuring that the information provided on the landing pages is complete, accurate and provided in accordance with applicable regulatory requirements.**

Certifications (data attribute codes: 11.02-11.32)

This section contains information about third-party certifications, quality marks or item grades (such as "Grade A"), economically related certifications such as "Fair Trade" and "Dolphin Safe", and food safety certifications. Refer to the Food and Beverage Attribute List for a complete set of attributes that can be displayed under this category.

At the top of Certifications section, the **required fixed copy** reads: "SmartLabel includes certifications from independent organizations that have meaningful and consistent standards for product composition, environmental protection, and/or social justice."

If the certifying body has a seal or logo, that should be displayed, as permitted by the certification standard:



As in the example above, brands may display the description of the certification (voluntary) and/or include a hyperlink to the website of the certifying organization, using an arrow on the right side of the certification. If a hyperlink is used, it must display the "leaving SmartLabel" notification.

NOTE: We encourage brands utilizing third-party certifications to use certification descriptions provided by the certifying body. Do not display product claims in Certifications.

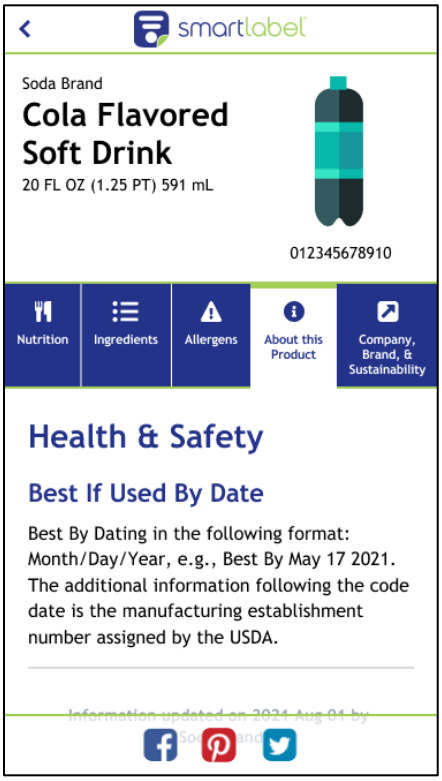
Health & Safety (data attribute codes: 13.01-13.37)

This section contains information about precautions and warnings, product safe handling, temperature ranges for safety, and health claims. Refer to the **Food and Beverage Attribute List** for a complete set of attributes that can be displayed under this category

Required attributes under this section should be displayed before voluntary attributes. These include **precautionary or warning statements** required by regulation and safe handling statements:

Examples of warning statements required by regulation:

- "This product has not been pasteurized and, …"
- "Phenylketonurics: Contains Phenylalanine"
- "Excess consumption may have a laxative effect"
- "Treated with radiation"



Examples of precautionary or warning statements not required by regulation:

- "Choking hazard"
- "Package may be hot after microwaving"
- "Packaging has sharp edges"

Examples of safe handling statements:

- "Refrigerate after opening"
- "Keep frozen – cook thoroughly"
- "Storage and safe handling instructions – keep frozen until ready to serve. Do not refreeze thawed product. Adults, supervise heating by children.

Voluntary attributes, such as product code dating explanations, in this section are listed after required attributes. Example of code dating explanations:

- "BEST if Used By"
- "USE By"

At the least, a description of where on the packaging the expiration date can be found would be useful information for the consumer.

When a voluntary attribute with customized text (like plain language descriptions) is displayed, the notification **"definition provided by [definition provider] must be included.** When links are provided to other resources, there must be a **"leaving SmartLabel"** notification.

Requirements for CBD products

SmartLabel requires that products containing cannabidiol (CBD) provide the following precautionary statements and links to consumer education materials by the FDA listed below. Because the links take users to a page outside of SmartLabel, a "Leaving SmartLabel" notification must be displayed. The language and links appear below:

"Our products contain CBD (cannabidiol), an extract derived from the hemp plant. Cannabidiol has not been approved by the FDA beyond a small number of specific disease conditions. The FDA has a website dedicated to CBD. Consult these links for additional information:

- What You Need to Know (And What We're Working to Find Out) About Products Containing Cannabis or Cannabis-derived Compounds, Including CBD
- What You Should Know About Using Cannabis, Including CBD, When Pregnant or Breastfeeding
- Some Medicines and Driving Don't Mix
- This product is not recommended for children or women who are pregnant or lactating. If you take any medications, consult your health care provider before using this product."

Requirements for FDA regulated alcoholic beverages

The following warning statement is required to be displayed under the Health & Safety subcategory of the Features and Benefits tab: "*GOVERNMENT WARNING: (1) According to the Surgeon General, women should not drink alcoholic beverages during pregnancy because of the risk of birth defects. (2) Consumption of alcoholic beverages impairs your ability to drive a car or operate machinery and may cause health problems.*"

Product Instructions (data attribute codes: 14.01-14.13)

This section includes voluntary attributes relating to preparation, cooking instructions, yield of the product as prepared, serving suggestions, recipes and

storage. Refer to the Food and Beverage Attribute List for a complete set of attributes that can be displayed **under this category.**

When a voluntary attribute with customized text (like plain language descriptions) is displayed, the notification **"definition provided by [definition provider] must be included.** When links are provided to other resources, there must be a **"leaving SmartLabel"** notification.

Company, Brand & Sustainability tab (data attribute codes: 8.01-15.06)
This section is where brands can continue to engage with the consumer by providing hyperlinks to the brand and/or company website pages. Sustainability attributes are also located on this tab.

Company Contact Information

Under this tab, **the company contact information for Customer Support must be displayed at the top of the page**.

NOTE: The Contact Us link to Customer Support is required for all product pages. The Contact Us icon must link to the brand's online contact form or a prepopulated email to customer support.

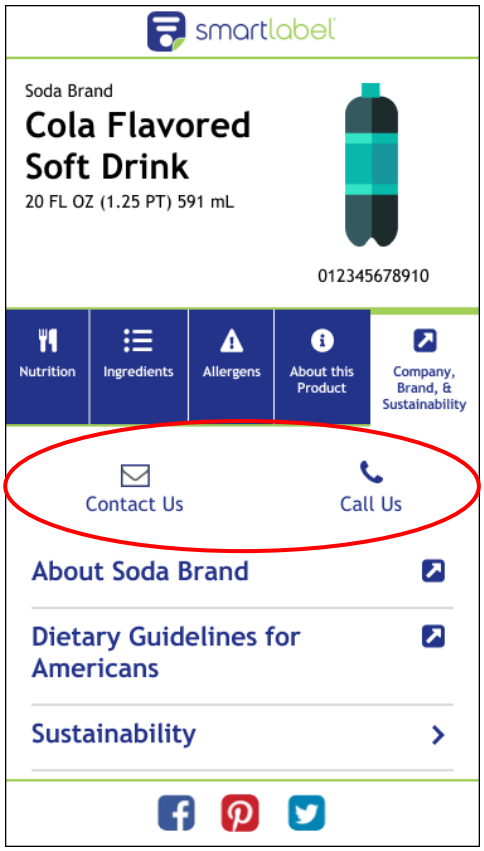
The Call us icon can display the customer support telephone number when clicked or link to an online prompt to call. The brand may choose to list the hours this is available (e.g., "Call us anytime 8 a.m. – 6 p.m. EST"). Email and phone links must be usable from the user's device.

Company, brand, and third-party hyperlinks

Below the contact information, brands can insert hyperlinks to their brand and company websites, and to third-party websites, as in the example above. When one of these links is selected, there **must be a notification** that they are leaving the SmartLabel site.

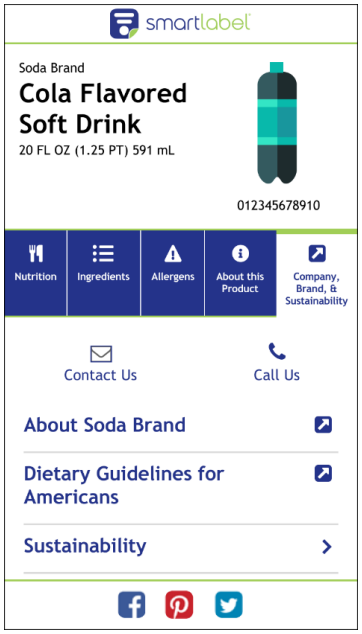
Brands may use a more prominent visual representation of the web destination(s) in lieu of a list of hyperlinks. This is acceptable if the required company contact information is listed at the top of the page and the "leaving SmartLabel" notification appears.

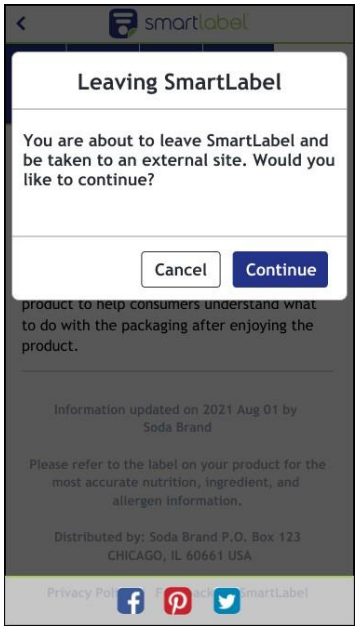
Note: If you choose to use clickable images as hyperlinks to your corporate or brand site(s), keep in mind that SmartLabel is built as a responsive website that dynamically sizes automatically to fit the consumer's device, be that a smart phone, tablet, or computer. Images need to render properly as the site resizes for different devices.



Sustainability Claims (data attribute codes: 8.01-8.09)

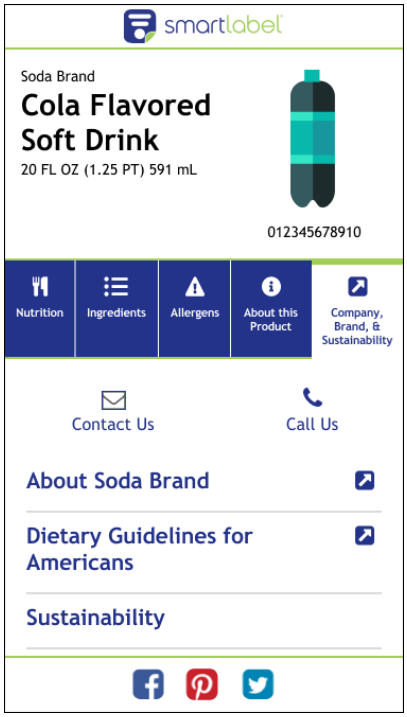
Sustainability attributes, including product specific information and/or information on brand or corporate sustainability practices, are located on the Company, Brand & Sustainability tab under the Sustainability subcategory.





Mockups of the packaging and recycling attributes appear in Appendix B. Refer to the **Food and Beverage Attribute List** for a complete set of recycling and packaging attributes that can be displayed under sustainability.

Sustainability attributes may be displayed directly on the Company, Brand and Sustainability tab and can include links to How2Recycle and corporate sustainability practices. When hyperlinks are used, the **"leaving SmartLabel" notification** must appear.





Recycle Check and CIRT Check

The SmartLabel program has partnered with The Recycling Partnership and CIRT Check to make their zip-code level recycling applications available to SmartLabel participants on the Intermediate Menu and/or on the Company, Brand & Sustainability tab. For those brands that opt to integrate Recycle Check or CIRT Check with SmartLabel, consumers can simply scan the SmartLabel QR code on a product package, enter their zip code, and learn how to recycle the product in their current location.

These programs leverage their organizations' national recycling databases, which centralize up-to-date recycling access data from more than 9,000 community programs covering 97% of the U.S. population. These features are available to SmartLabel brands to implement on a voluntary basis.

Recommended SmartLabel Copy: Recycle Check

For those participating in Recycle Check, sample assets and mockup page examples are provided below for both the Intermediate Menu pages or the Company, Brand & Sustainability tab on the SmartLabel page. Please include appropriate copy and images provided by Recycle Check.

Note: Recycle Check will provide unique URLs for each product package to retrieve specific local recycling access information. It's important to embed the correct URL for each hyperlink.

Intermediate Menu

Recycle Check Logo: Implementers must use the Recycle Check blue logo (below). Do not change logo colors, size, typography or background color. Do not distort. Do not use this logo outside of the SmartLabel platform. Please reference Recycle Check's additional social media assets for external promotion.

Primary Text: Local Recycling Guidelines



Company, Brand & Sustainability Tab

Primary Text: Local Recycling Guidelines

Recycle Check Logo: Implementers must use the Recycle Check blue logo (below). Do not change logo colors, size, typography or background color. Do not distort. Do not use this logo outside of the SmartLabel platform. Please reference Recycle Check's additional social media assets for external promotion. Additional display requirements include:

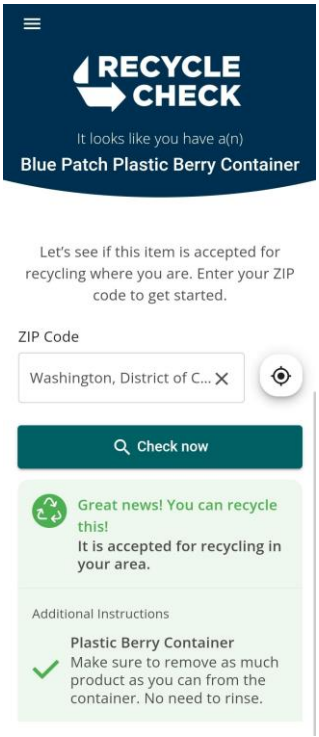
- Text and logo must be left justified in menus
- Always pair descriptive text with the Recycle Check logo icon or Recycle Check logo. The logo should be rendered in Smart Label blue, not in black.

See examples below:









Recycle Check SmartLabel Assets

Below are the approved logo and icon for Recycle Check Implementations in SmartLabel. Click here to access the assets.



Recycle Check Logo for Smart Label



Recycle Check Icon for Smart Label

For more information on implementing Recycle Check with SmartLabel, contact recyclecheck@recyclingpartnership.org and reference SmartLabel.

About Recycle Check

The Recycling Partnership is a 501(c)3 non-profit that mobilizes people, data, and solutions across the value chain to unlock the environmental and economic benefits of recycling and a circular economy. Learn more.

Recommended SmartLabel Copy: CIRT Check

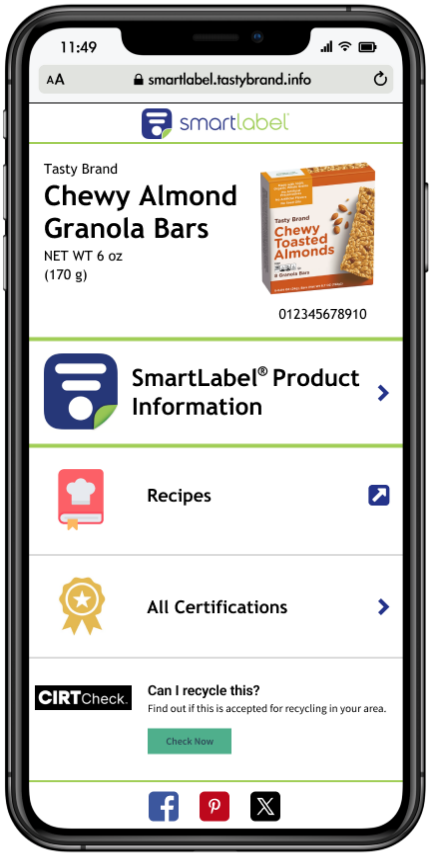
For those participating in CIRT Check, sample assets and mockup page examples are provided below for both the Intermediate Menu pages or the Company, Brand & Sustainability tab on the SmartLabel page. Comprehensive sample assets and mockups are available to guide your design process. Remember to incorporate CIRT Check official copy and imagery to maintain brand consistency.

Note: CIRT will provide a unique URL for each product to deliver packaging-specific, localized recycling access information. It is important to embed the correct URL for each hyperlink.

Intermediate Menu

CIRT Check Logo: Implementers must use the CIRT Check black & white logo (below). Do not change logo colors, size, typography or background color. Do not distort. Do not use this logo outside of the SmartLabel platform. Please reference CIRT Check's additional social media assets for external promotion.

Primary Text: Can I Recycle This?
Secondary Text: Check if this item is accepted for recycling in your area.
Button Text: Check Now



Company, Brand & Sustainability Tab

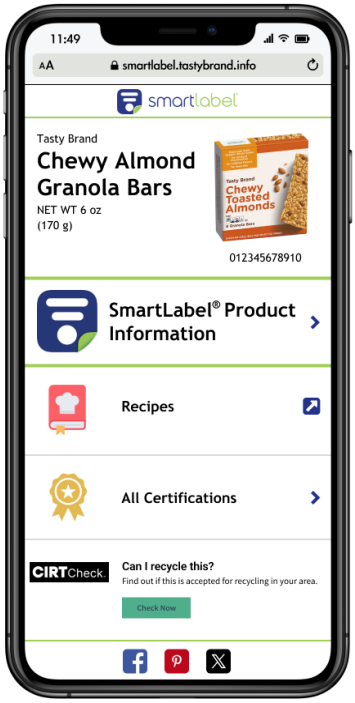
Primary Text: Can I Recycle This?
Secondary Text: Find out if this is accepted for recycling in your area.

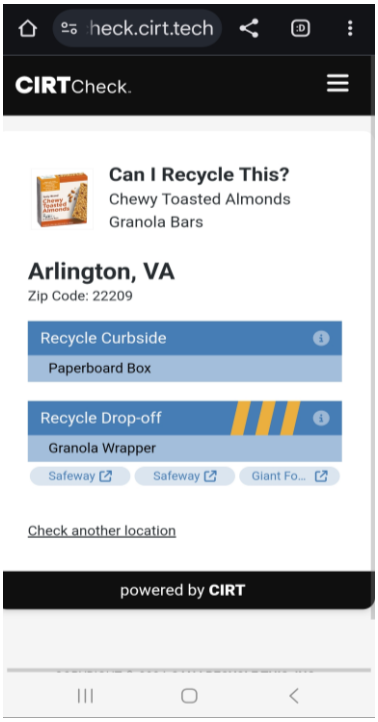
CIRT Check Logo: Implementers must use the CIRT Check black & white logo (below). Do not change logo colors, size, typography or background color. Do not distort. Do not use this logo outside of the SmartLabel platform. Please reference CIRT Check's additional social media assets for external promotion. Additional display requirements include:

- Text and logo must be left justified in menus
- Always pair descriptive text with the CIRT Check logo icon or CIRT Check logo. The logo should be rendered in black and white.

See examples below:







smartlabel

CIRT Check SmartLabel Assets

Below is the approved logo and icon for CIRT Check implementations in SmartLabel. Click here to access the assets.

CIRT Check™

For more information on implementing CIRT Check with SmartLabel, Christian Foster, support@cirt.tech, and use “SmartLabel Referral” in the subject line

About CIRT

CIRT is an award-winning, women-owned B-Corp data and technology company. CIRT produces data-driven SaaS-based solutions, transforming sustainability into a competitive growth advantage. They help businesses ensure compliance, enhance consumer trust, and adopt circular economy practices through real-time data and efficient operations. Learn more at www.cirt.tech.

VI. Infant Formula

Infant formula is a special subset of FDA-regulated food and is subject to unique requirements, including labeling requirements. Please refer to the Food & Beverage Attributes sheet for infant formula attributes.

Header (data attribute codes: 1.01-1.22)

The header **must** include:

1. Marketing image of the product
2. General information about the product (such as the UPC/GTIN, brand, sub-brand, flavor, and product description)
3. Size information (net weight/contents statement)

Federally mandated declarations (e.g., inspection legends for meat, wild/farmed declaration for seafood and the USDA BE disclosure symbol or text statement, as applicable.

Please refer to the Section labeled Header for more information on required and voluntary attributes for certifications.

Footer (data attribute codes: 2.01-2.08)

The bottom of the screen **must** contain a footer section with information in the following order:

1. **Optional:** Statement instructing the consumer to refer to the product packaging for the most up-to-date product information.

2. **Required**: Date of updates to the landing page: “Information updated on [Date] by [Company Name]. The timestamp must follow the DD-MMM-YYYY format.

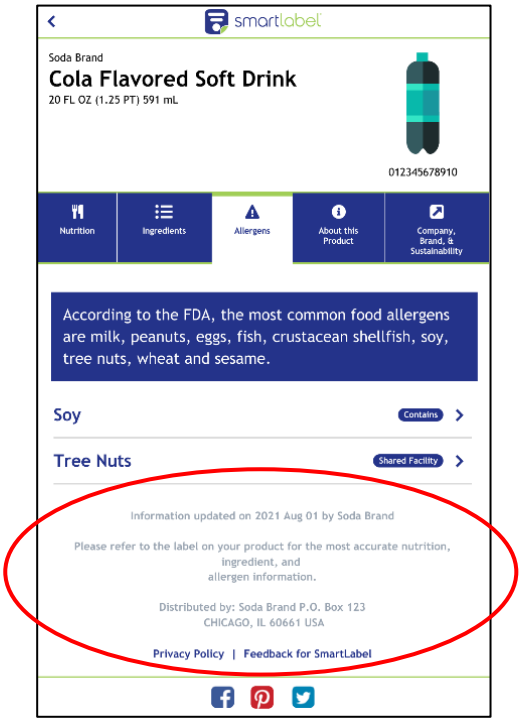
3. **Required**: Manufactured by statement: “Manufactured by [Company]” and/or

6. **Required**: Distributed by statement: “Distributed by [Company], [Company Address]

7. **Required:** Company Privacy Policy and Feedback for SmartLabel links on one line. The Privacy Policy must link to the company’s privacy policy. The Feedback link **must** prompt an email that links to the Contact Form on www.smartlabel.org.

8. **Optional:** Social media icons with links to the company’s social media platforms. Social media links should allow the user to share the landing page on their own social media platforms. Companies looking to provide consumers with their branded social media links should utilize the company, brand & sustainability tab for this outreach.

Optional header or footer information includes language capabilities and a variant disclaimer where needed.



Nutrition Tab (data attribute codes: 3.11-3.18)

For infant formula, it is required that brands exactly mirror the nutrition information on the physical package, including required directions for use and pictorials of major steps of preparing the formula, where technology allows. The infant formula Nutrition Panel must be formatted and rendered exactly like the example below:

Nutrients	Per 100 Calories	DILUTED: EACH 5 FL OZ (150 mL)
Calories (Cal)		100
Protein (g)		2.07
Total Fat (g)		5.6
Total Carbohydrate (g)		10.7
Water (g)		133
Linoleic Acid (mg)		860
Vitamins		
Vitamin A (IU)		300
Vitamin D (IU)		75
Vitamin E (IU)		1.5
Vitamin K (mcg)		8
Thiamin (mcg)		100
Riboflavin (mcg)		160
Vitamin B6 (mcg)		63
Vitamin B12 (mcg)		0.26
Niacin (mcg)		1100
Folic Acid (mcg)		16
Pantothenic Acid (mcg)		470
Biotin (mcg)		4.6
Vitamin C (mg)		9
Choline (mg)		24
Inositol (mg)		4.9
Minerals		
Calcium (mg)		82
Phosphorus (mg)		44
Magnesium (mg)		6
Iron (mg)		1.9
Zinc (mg)		0.79
Manganese (mcg)		5
Copper (mcg)		95
Iodine (mcg)		6
Selenium (mcg)		2
Sodium (mg)		25
Potassium (mg)		110
Chloride (mg)		68

NOTE: Almost all infant formulas will declare a value of 0 for Saturated Fat and Sugar. It is recommended that an asterisk be added by Sat Fat and Sugar in Facts up Front with the statement below the Nutrition Panel, "Typical FDA-approved infant formulas provide 0 g for both saturated fat and total sugars."

The **Calorie Statement must** appear at the top of the Nutrition Panel (21 CFR 107.10(a)(1)): The number of fluid ounces that provide 100 calories.

The following nutrients are **required**:

- Protein, Fat, Carbohydrates, Water, Linoleic acid

The following vitamins are **required**:

- Vitamin A, Vitamin D, Vitamin E, Vitamin K, Thiamine (Vitamin B1), Riboflavin (Vitamin B2), Vitamin B6, Vitamin B12, Niacin, Folic Acid (Folacin), Pantothenic Acid, Biotin, Vitamin C, Choline, Inositol
- Note that Biotin, choline, and inositol content **must** be declared except when they are not added to milk-based infant formulas.

The following minerals are **required**:

- Calcium, Phosphorus, Magnesium, Iron, Zinc, Manganese, Copper, iodine, Selenium, Sodium, Potassium, Chloride

Additional vitamins/minerals can be declared if they are identified by FDA or the IOM as essential and present at levels having biological significance.

Iron Statements: Either "Infant Formula with Iron" or "Additional Iron May Be Necessary" depending on whether 1 mg of iron is present per 100 calories.

NOTE: SmartLabel requires that brands reproduce exactly any product warnings labels and directions for use under the Health & Safety tab. These statements must follow all formatting requirements set forth by the FDA.

Ingredients tab (data attribute codes: 4.01-4.18)

Under the ingredients tab, ingredients **must** appear in a **stacked list**. **This list, and the order in which the ingredients are listed, must mirror the ingredient list on the package**.

Please refer to the Ingredients Tab information on page 44 for more information on required and voluntary ingredient attributes.

Allergens tab (data attribute codes: 5.01-5.23)

This section is used to disclose the top nine allergens identified by the FDA. **Any "allergen free" statements MUST be placed under the Features & Benefits section of the About this Product Tab.**

Please refer to the Allergens Tab information on page 46 for more informaton on required and voluntary allergen atrributes.

About this Product tab (data attribute codes:???

The About this Product tab takes the place of the "Features & Benefits" tab. This tab has four sections, displayed in stacked horizontal bars shown in the order seen below:

- Features & Benefits
- Certifications
- Health & Safety
- Product Instructions

Many of the attributes in this tab are voluntary. If a company is not disclosing any voluntary attributes under one of these sections, that section header will not appear

Features & Benefits (data attributes codes: 10.01-10.87)

This section contains voluntary attributes pertaining to nutrient content claims, ingredient absence statements, compositional claims, origin statements, method of production, growing methods, and so on. Refer to the Food and Beverage Attribute List for a complete set of attributes that can be displayed under this category.

Please refer to the Section labeled Features & Benefits for more information on required and voluntary attributes and claims.

Certifications (data attributes codes: 11.02-11.32)

This section contains information about third-party certifications, quality marks or item grades (such as "Grade A"), economically related certifications such as "Fair Trade" and "Dolphin Safe", and food safety certifications. Refer to the **Food and Beverage Attribute List** for a complete set of attributes that can be displayed under this category.

Please refer to the Section labeled **Certifications** for more information on required and voluntary attributes for certifications.

Health & Safety (data attributes codes: 13.01-13.36)

This section contains information about **precautions and warnings, product safe handling, temperature ranges for safety, and health claims.** Refer to the **Food and Beverage Attribute List** for a complete set of attributes that can be displayed under this category

Required attributes under this section should be displayed before voluntary attributes. These include **precautionary or warning statements** required by regulation and safe handling statements:

NOTE: SmartLabel requires that brands reproduce exactly any product warnings labels and directions for use under the Health & Safety Tab. These statements must follow all formatting requirements set forth by the FDA.

Use by Date (21 CFR 107.20(c))

The use by dates are determined by the manufacturer/distributor but must be on the basis of tests or other information showing that under the conditions of handling, storage, and preparation that the infant formula when consumed will contain not less than the quantity of each declared nutrient and will otherwise be of an acceptable quality (e.g., pass through an ordinary bottle nipple).

In instances where it is technologically or practically infeasible to include the accurate "use by" date for the specific package on the SmartLabel page, use a statement such as the following and reference the location of the "use by" date on the package if uniformly located: "Do not use after the "Use By" date listed on the product package."

Please refer to the Section labeled **Health & Safety** for more information on required and voluntary attributes for certifications.

Product Instructions (data attribute codes: 14.01-14.13)

This section includes voluntary and required attributes relating to preparation, and yield of the product as prepared.

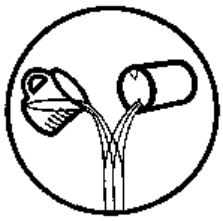
Under Product Instructions, directions must be provided for storage, agitation, sterilization, and dilution, along with a pictogram illustrating the major steps for preparing the formula.

It is required that all product warning labels and directions for use on the product packaging be exactly reproduced under the Product Instructions subcategory. These statements must follow all formatting requirements set forth by FDA.

Added Water Requirements (21 CFR 107.20(d)):

For liquid concentrate or ready-to-feed formulas, the statement "Add Water" or "Do Not Add Water", as appropriate, **must** be displayed near the top of the About this Product tab.

Concentrates with the "add water" statement **must** be accompanied by a symbol depicting the addition of water on a white background encircled by a dark border, e.g.:



Warning Statements (21 CFR 107.20(e-f)).

- A warning statement **must** be displayed beneath or in close proximity to the **"Directions For Preparation and Use"** that cautions against improper preparation or use of an infant formula, such as "THE HEALTH OF YOUR INFANT DEPENDS ON CAREFULLY FOLLOWING THE DIRECTIONS FOR PREPARATION AND USE."
- A statement **must** be displayed indicating that parents should consult their physicians about the use of infant formulas, such as "USE AS DIRECTED BY A PHYSICIAN".

Refer to the Food and Beverage Attribute List for a complete set of attributes that can be displayed under this category.

Company, Brand & Sustainability tab (data attribute codes: 8.01-15.08)

This section is where brands can continue to engage with the consumer by providing hyperlinks to the brand and/or company website pages. Sustainability attributes are also located on this tab.

Please refer to the Section labeled **Company, Brand & Sustainability** for more information on required and voluntary attributes for certifications.

VII. Food Safety: Baby Food Testing

California (AB 899) and Maryland (HB 443) have passed legislation requiring manufacturers of baby food to test for four heavy metals and post the results on the manufacturer's website.

The California law mandates that any baby food products sold or made in the state must be tested for arsenic, cadmium, lead, and mercury (referred to as "toxic" elements), beginning January 1, 2024. The legislation also requires test results to be posted on the manufacturer's website, beginning January 1, 2025. Maryland requires the same monthly testing and public disclosure on the manufacturer's website, beginning January 1, 2025, and January 1, 2026, respectively.

Baby food is defined as food packaged in jars, pouches, tubs, and boxes that is marketed to children under two years of age. Baby food that does not comply with the legislation will be prohibited from sale, manufacture, delivery, holding, or offering for sale in the state. Additionally, as of January 1, 2025, Maryland specifically prohibits the sale and distribution of baby food in the state that contain specified heavy metals that exceed limits established by FDA; however, such prohibition does not apply to baby food manufactured before January 1, 2026. **Infant formula is not included in either law.**

Testing Requirements: Manufacturers of baby food for sale or distribution in California and Maryland are required to test a representative sample of each production aggregate of the manufacturer's final baby food product, at a proficient laboratory meeting certain criteria, for heavy metals at least once per month. Test results must be provided to any authorized agent of the California Department of Public Health or the Maryland Department of Health upon request.

Disclosure Requirements: Manufacturers of a final baby food product that is sold, manufactured, delivered, held, or offered for sale in California and Maryland must "make publicly available"* on their website the following information, beginning January 1, 2025, and January 1, 2026, respectively:

- **The name and level of each heavy metal element present in each production aggregate of the final baby food product.** The California law specifies that this disclosure must be made available on the manufacturer's website for the duration of the product shelf life plus one month.
- Descriptive information to enable accurate identification of the final baby food product by consumers. Descriptive information may include, but is not limited to, **product name, UPC, size, lot numbers, or batch numbers**.

* The California and Maryland laws do not specify how the required information must be presented on the manufacturer's website (e.g., whether it must appear on the first page or can be accessed after one or more clicks).

- In Maryland, a link to the FDA website "that includes the most recent [FDA] guidance and information about the health effects of the toxic heavy metals on children."

Additionally, if the product is tested for a heavy metal subject to an FDA action level, regulatory limit, or tolerance, the product label must include a QR code or other machine-readable code that links to a page on the manufacturer's internet website, accompanied by the following on-pack statement: *"For information about toxic element testing on this product, scan the QR code."*

The website must include the test results for the heavy metal, and a link to the FDA website where consumers can find the most recent FDA guidance and information about the health effects of the heavy metal on children.

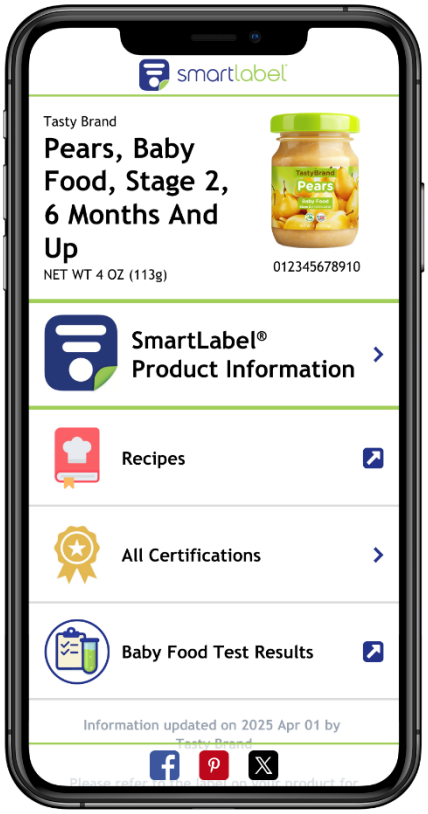
Implementing Baby Food Testing Legislation in SmartLabel (data attribute code: 13.37)

The SmartLabel QR code on-pack can be used to implement the baby food legislation requirements and would link to the intermediate menu and/or to Health & Safety under the About this Product tab as depicted below through the use of the following symbol which brands can access in the Brands Portal on www.smartlabel.org under the icon labeled "Implementation Manuals and Attribute Sheets."

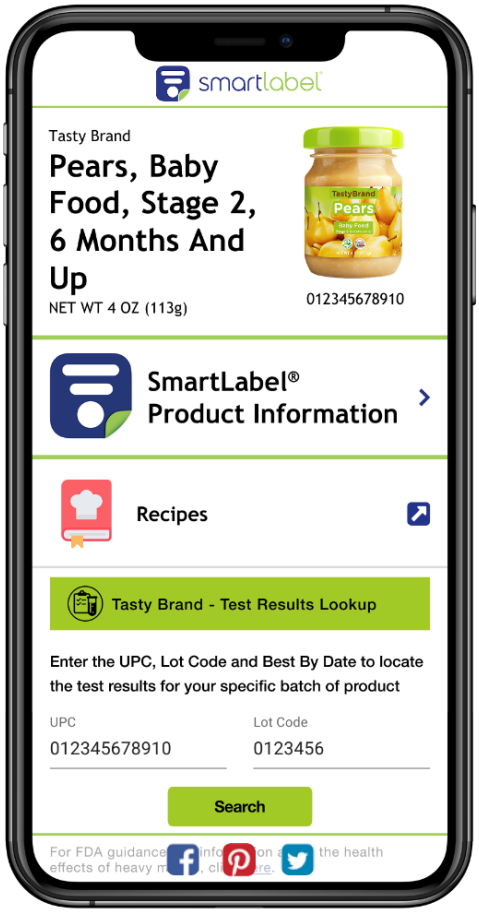


Intermediate menu

On the **intermediate menu**, use a button to link to the website page where the user can enter the descriptive information (product name, UPC, size, lot numbers, or batch numbers) to access the test results. The button **must** include the Test Tube symbol, read **"Baby Food Test Results"** and hyperlink to the test results website page.

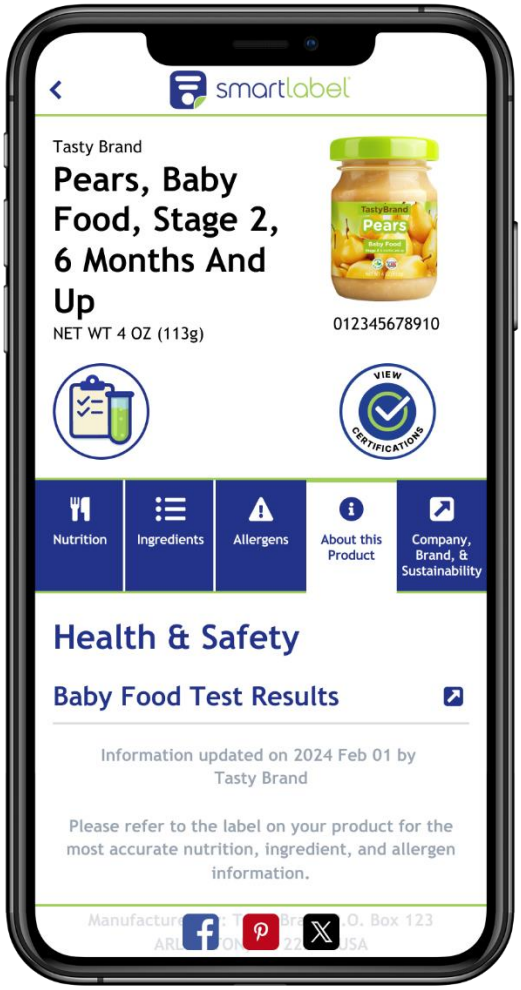


Alternatively, brands can implement a **widget** on the SmartLabel intermediate menu that allows the consumer to enter descriptive information such as UPC code, Lot Code and Best By dates and click a **Search** button to access the test results. The widget **must** include the Test Tube image, read "**Brand Name - Test Results Lookup**" and hyperlink to the test results website page as in the example below.



SmartLabel Food and Beverage Page Execution

On the **SmartLabel page**, use the **Health & Safety section** on the **About this Product** tab to hyperlink to the website page where users can enter the descriptive information (product name, UPC, size, lot numbers, or batch numbers) to access the test results. The page **must** include the Test Tube symbol, the text **"Baby Food Test Results"** and hyperlink to the test results website page.


smartlabel
Tasty Brand
Pears, Baby Food, Stage 2, 6 Months And Up
NET WT 4 OZ (113g)
012345678910
VIEW CERTIFICATIONS
Nutrition
Ingredients
Allergens
About this Product
Company, Brand, & Sustainability
Health & Safety
Baby Food Test Results
Information updated on 2024 Feb 01 by Tasty Brand
Please refer to the label on your product for the most accurate nutrition, ingredient, and allergen information.

VIII. Intermediate Landing Page

The SmartLabel intermediate landing page is an optional digital product information page that includes a product information section as well as a self-directed menu offering multiple electronic or digital links to product, brand, or other information.

a. Intermediate Landing Page design requirements

Products that are using an intermediate landing page and the SmartLabel logomark and logotype must follow these parameters:

The intermediate landing page must consist of two sections:

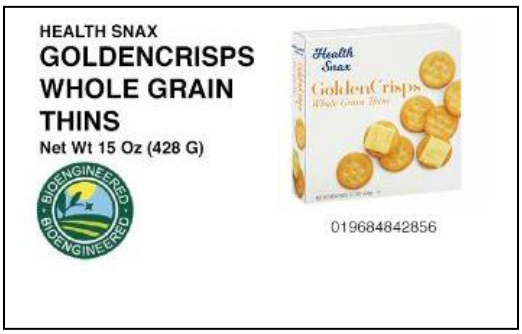
1. Product information section with high-level product information must **mirror the header on the SmartLabel landing page** and include the BE disclosure if applicable.

2. The lower section, which includes a **menu of links** for the consumer to access additional information.

Product information section

To ensure consistency with landing page visual design standards, the product information section of the intermediate landing page should adopt the same design standards. Required elements of the product information section include the SmartLabel logo, the brand name, product name or descriptor, product size information, a product marketing image and the GTIN/UPC.

Where disclosure requirements exist, appropriate disclosure badges are required. The badges used in the top section will be consistent in size such that, if used, the BE symbol should be equal in size to any other badge (e.g. the inspection legend for meat). No other information should be provided in this top section. The top section must comprise at least the top 35% of the relative screen height when viewed on all devices.





Menu of button links section

The lower section of the intermediate landing page can provide a menu of button links to allow consumers to access additional content, including SmartLabel information.

Subject to the following requirements, companies will have discretion as to the number of links provided and their content:

- **The button links may comprise no more than 65% of the relative screen height of the landing page** as initially viewed by the consumers on all devices. Members may provide links that extend beyond the original screen first seen by consumers.

- **The first button link must be a link to the SmartLabel landing page**, described in Section V of the implementation manual. The text statement accompanying the button should read **"SmartLabel® Product Information"** in **Trebuchet MS** font to maintain consistency with the product's SmartLabel page.

- The heights of button links will be contingent upon the number of button links included, or a **minimum 100 px**. It is recommended that the button links follow the same type styles as are used on the SmartLabel landing page.

- The lower section may only include button links. It cannot include additional product attribute or information, promotional or marketing material, or other content. Use the button links to provide access to other information such as marketing or promotional material.

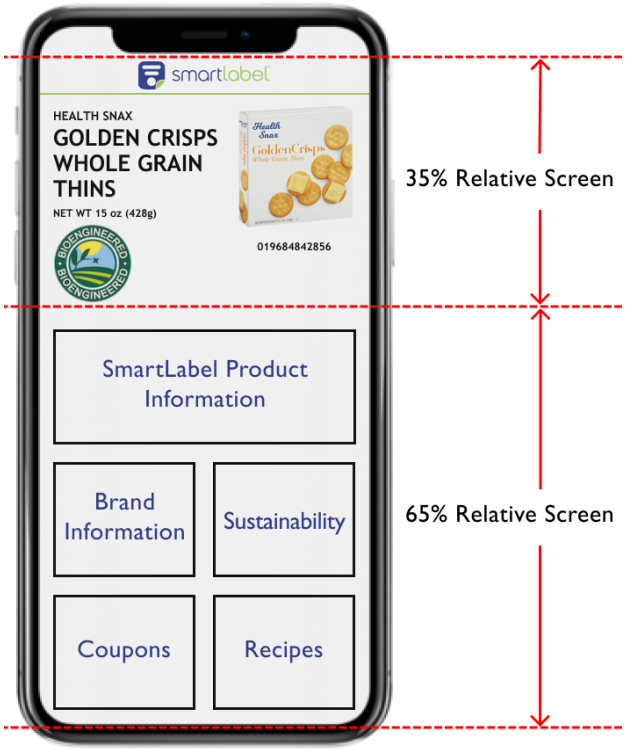
- **When an electronic or digital link is used to make a BE food or food ingredient disclosure,** it is recommended that companies not use the term "marketing" or "promotional material" in the names of the button links to avoid potentially conflicting with NBFDS regulations.

b. Design Styles

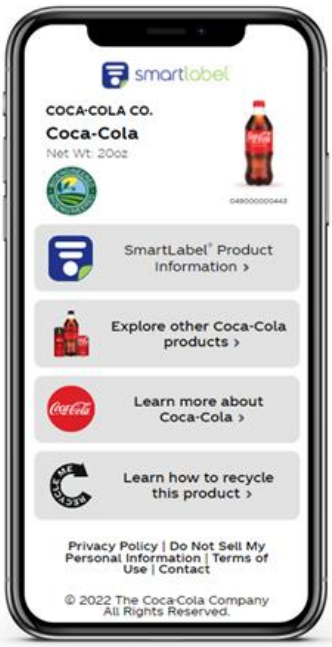
To provide a consistent background across all participating brands utilizing the intermediate landing page, a white, unbranded background is required.

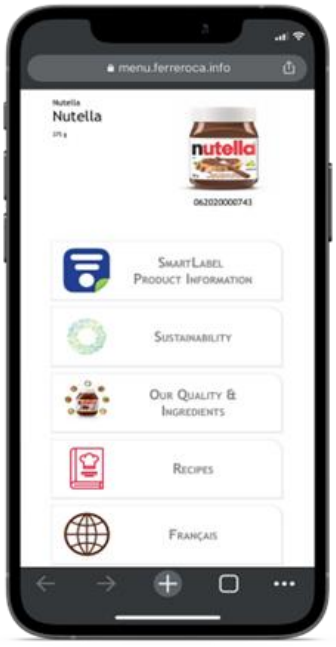
The following are potential design styles for the intermediate landing page. They are not intended to be an exhaustive list of examples of permissible designs.

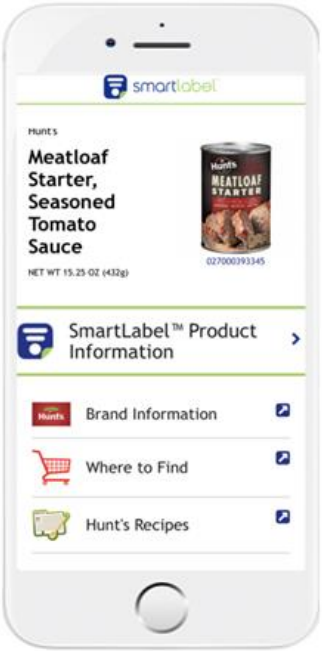


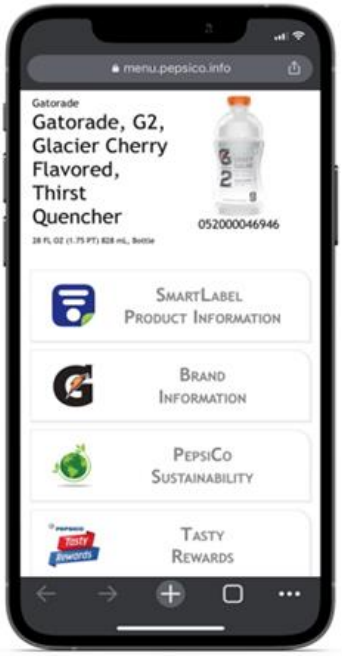


The following are examples of intermediate menus in market today:









c. Legal Considerations for Using Intermediate Landing Page for BE Disclosure

This section is intended to help companies using the Intermediate Menu comply with the mandatory or voluntary disclosure of bioengineered (BE) food or food ingredients under the National Bioengineered Food Disclosure Standard (NBFDS).

Placement of BE disclosure on the intermediate landing page

When an electronic or digital link is used to make a BE food or food ingredient disclosure, the electronic or digital link must "go directly to the product information page" that contains the BE disclosure. The disclosure "must be the first screen to appear on an electronic or digital device after the link is accessed." **This means that the top section of the intermediate landing page containing product information must conform to the requirements for either text or symbol disclosure for BE.** Refer to illustrations on previous page.

Avoid overt marketing or promotional content

In a 2020 letter to FMI, the Agricultural Marketing Service (AMS) indicated that the general template for the intermediate landing page would comply with the NBFDS.

The digital or electronic link disclosure must also:

- Appear without any "marketing or promotional material" on the product information page. The rule defines "marketing or promotional material" as information used "to assist in the sale or promotion of a product."

- Avoid the sale, collection, or analysis of any personally identifiable information about users or the devices used to access the platform. If such information must be collected to carry out the purposes of the rule, the information must be deleted immediately and not used for any other purpose.

Hogan Lovells has provided a legal opinion to the SmartLabel office on what constitutes marketing and promotional information to help inform SmartLabel implementers and all regulated entities in their decision-making process for NBFDS compliance. Based on the Hogan Lovells opinion, the SmartLabel office offers the following recommendations for consideration:

- Links or buttons are appropriate when they facilitate access to marketing and promotional information but the links or buttons on the intermediate menu should not contain marketing and promotional information.

- Be mindful of the language used on links or buttons. Offers of "buy one, get one free" or "coupon for 25% off next purchase" may be viewed in a different light than a general descriptor of "rewards program" or "coupons".

- Similarly, use of “marketing” or “promotions” in button descriptions may cause confusion given the Standard’s prohibition against marketing and promotional material.

As Hogan Lovells notes in the conclusion of their opinion, there are legal considerations beyond the view of AMS that all implementers should be aware of:

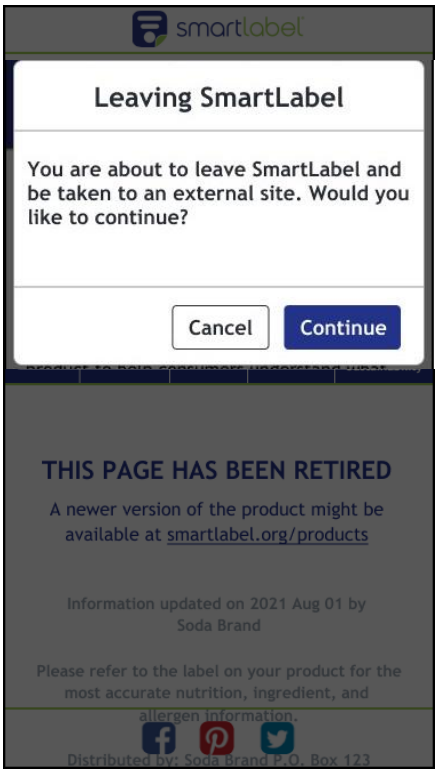
> *In conclusion, AMS has confirmed the use of the buttons or links similar to those found in this letter are not considered marketing and promotional information. Establishments, therefore, should have confidence AMS will not object to their presence on the landing page. Please recognize there can be no assurance the class action lawyers or NGOs would concur with the AMS position. If an action is filed against an establishment under a state consumer protection law for using one of the examples considered appropriate by AMS, there can be no assurance the reviewing court would consider the AMS position dispositive.* ***Establishments should consult with their legal and regulatory counsel when assessing the buttons or links that would be included on the landing page of their products****.*

Please contact the SmartLabel office with any questions about the intermediate menu for BE disclosure.

IX. Archiving SmartLabel Pages

This section addresses the requirements for retiring SmartLabel pages for discontinued products to meet WCAG AAA requirements and to ensure consistent execution by all brands and products. SmartLabel requires that the product landing page header and five tabs remain visible with a notification statement "This Page Has Been Retired" appearing in the white space below.





The brand has the option to provide a link to smartlabel.org, to a new SmartLabel URL for a similar product, or to the brand's website using the copy below:

1. "A newer version of the product might be available at smartlabel.org/products/."
2. "A newer version of the product is available at new SmartLabel URL." This copy links to the substitute product page.
3. "A newer version of the product might be available at Brand Website URL. This copy links to the brand's website.

When one of these links is selected, there **must be a notification** that they are leaving the SmartLabel site, as in the example above.

The recommended time frame for archiving a page is:

No sales in last 12 months + product shelf life + 6 month buffer

In other words, the product must have had zero sales in the last 12 months, AND the shelf life of that product must have passed AND an additional 6 months buffer should be allowed for products that may still be in the market.

X. Consumer Pathways

a. Search pathway

Search does not require the consumer to have a physical package.

- **Brand Search:** Brands embedding the logo must take the consumer to the intended landing page in **two clicks or less.**

- www.smartlabel.org: provides consumers a one-stop shop to search for all registered landing pages. Consumers can search by company, brand and product. Clicking on a line item will take the consumer directly to the brand owned landing page.

- **SmartLabel App**: A product search function is included in the SmartLabel app.

- **Search Engine:** participating item GTINs and the SmartLabel initiative can use SEO and structured metadata to facilitate the consumer path to an item's SmartLabel landing page. Both capabilities are described below.

    - **Search engine optimization** – SEO is facilitated through paid search (participating brand owners buy key words) and earned search. Earned search is facilitated through common structured metadata across SmartLabel landing pages. Paid search is an ongoing analysis to understand changing traffic patterns and requires continually updating the paid keywords.

    - **Structured metadata** – Using GS1 SmartSearch standards and guidelines, participating companies can embed the key aspects of the marketing strategy in a standard format within the webpages. Doing this aids the search for a given page and improves page visibility.

- **Third Party Website**: consumers may search on a third-party website, such as retailer's ecommerce website.

b. Mobile scan pathway

There are two mobile can pathways to SmartLabel pages:

- **Digital trigger using a smartphone:** If a consumer has the product in their hand (or an advertisement with a code), they can use the native scanning function in their mobile device to scan a SmartLabel digital link, such as a QR code or digital watermark embedded in the artwork. QR codes and digital watermarks can contain an embedded short URL (e.g. http://smtlbl.org/9t9ab0ht), which will bring the consumer from the physical package to the item's SmartLabel landing page.

- **Digital Trigger using the SmartLabel app:** The SmartLabel app enables consumers to scan a UPC, QR code, or digital watermark that contains the GS1 Global Trade Identification Number (GTIN) and be delivered to the brand's SmartLabel landing page. As technology changes and smart devices adapt, other links may become available.

  The official SmartLabel app is available for iOS and Android. Consumers who use the app will either be taken directly to the item's SmartLabel landing page or will receive a message that reads, "Sorry, this item is not a SmartLabel product. For a full list of SmartLabel participating products, please see www.smartlabel.org/products."

c. Managing SmartLabel landing page URLs

It is recommended that participating companies develop a strategy and standard methodology for generating SmartLabel landing page URLs.

1. **URL within company owned domain**: One notable best practice for URL management is to keep the URL within a domain owned by the company. This allows a company to control redirects when a product is discontinued.

2. **Use a standardized format**: Current participating companies suggest using a standardized format for the final target URL that shows up on a consumer's smartphone or browser. For example, Hershey is using the format http://smartlabel.hersheys.com/UPC-Variant to access the landing page associated with the product. They chose to use the 12-digit UPC format, then a "dash", then a 4-digit variant number.

3. **SmartLabel host name:** Having the same hostname "SmartLabel" in front of the brand corporate domain name provides a uniform experience for the consumer across brands and reinforces SmartLabel branding. Implementing a human readable UPC-Variant format further increases ease of use.

The SmartLabel office recommends that participating companies implement HTTPS across their SmartLabel portfolios. HTTPS provides an additional layer of confidence for consumers, and both the Google search engine and Google's Chrome browser give preferential treatment to HTTPS pages.

d. GS1 Digital Link

GS1 Digital Link provides a new syntax for expressing GS1 Identifier Keys (i.e., GTIN), key qualifiers and data attributes in a format that can be used on the web via a straightforward web request to enable consumers and others to directly access relevant information and services about products, assets, locations, etc.

Resembling a Uniform Resource Locator (URL) or web address, GS1 Digital Link can enable connections to all types of business-to-business (B2B) and business-to-consumer (B2C) information, providing the bridge between physical products and their digital assets.

GS1 Digital Link can be encoded natively in any data carrier that supports encoding of a web address or URL, or can be obtained by translating the element string in other GS1 carriers such as U.P.C. using a reference GS1 Web URI. For full details on GS1 Digital Link please see https://www.gs1.org/standards/gs1-digital-link.

e. SmartLabel logo

The SmartLabel logo is intended for use on packaging to notify consumers that SmartLabel data is available for an item GTIN. **The SmartLabel logo must be used in conjunction with a digital trigger (QR code, digital watermark) that directs the consumer to a SmartLabel landing page.**

f. Digital link artwork and "under construction" landing page

If a brand adds a SmartLabel logo and digital link/call-to-action to a physical label before the SmartLabel landing page has been developed, the brand has a ninety-day grace period to create a temporary "under construction" landing page.

Recommended Guidance on Copy for Temporary SmartLabel Landing Pages:

1) Explain SmartLabel using language aligned with the SmartLabel communications toolkit:
    a. "The SmartLabel program puts detailed information about the products you buy and use right at your fingertips."
    b. "SmartLabel makes it easier than ever to find information about the products you use and consume."
2) Explain why the brand is participating:
    a. "[Brand] is committed to transparency and is excited to share more of our product's story through SmartLabel."
3) Explain that the brand is still developing the SmartLabel landing page:
    a. "[Brand] is still working on gathering all the information necessary to provide a comprehensive SmartLabel experience."
4) Provide another channel for the consumer to access information about the product:
    a. "While we are building this exceptional experience, please visit the brand website [brand URL] to learn more about our products. If you still have questions, our customer service team is always happy to help at [brand customer service #] or [brand email]."

g. QR code overview

Companies can work with an array of vendors to secure the QR codes for their participating item GTINs. However, companies must maintain consistency with how QR codes and the SmartLabel logo are represented on packaging.

Packaging real estate is scarce for many packages, so multiple scalable options are available.

Participating companies have the responsibility to do their own print testing to ensure QR codes can be scanned consistently on various packaging substrates.

Patents have been granted in the United States and other countries that are directed to such systems and related processes. Companies using or planning to use such systems should consult with their patent counsel to determine whether their system or process comes within the scope of an existing patent before implementing or continuing to implement their system(s). If you are using a third-party provider to develop and/or implement your system, it is advisable to determine whether your service provider is licensed to make and sell the system you are using or intend to use.

If brands choose to use QR codes for NBFDS disclosure, please refer to earlier section of this document on Call-to-Action with QR code for Bioengineered Foods (BE) disclosure.

QR code considerations

The following table provides a list of thought points to help guide a company through the decision of implementing a QR code.

Question	Consideration
Does use of a QR code comply with the new BE regulations?	Yes, a QR code meets the requirement for a digital link under the proposed BE regulations.
Do I update my packaging frequently?	Companies use packaging changes as an opportunity to add QR codes for little cost. Packaging changes provide the opportunity to add a new URL in the QR code for new variant landing pages.
Do I have frequent product changes that do not require a new GTIN?	Communicating variant information (minor product change) is more easily facilitated with a QR code.
Is my company already placing QR codes on the package for other purposes?	Companies can utilize an existing QR code for both marketing and SmartLabel purposes with a user prompt.
Is visually communicating variant information to the consumer important to my brand?	Communicating variant information (minor product change) is more easily facilitated with a QR code
Is communicating brand participation in SmartLabel to the consumer important to my brand?	The QR code wrapped in the SmartLabel branding provides a strong visual indicator to a consumer that the product is participating

Can I use enhanced QR codes that contain more than the SmartLabel URL?	Yes, many companies use other codes within the QR to help branding, manufacturing process or traceability. This is acceptable if the enhancement does not disrupt the consumer SmartLabel experience.

Managing SmartLabel QR code embedded URLs

When using a QR Code, it is recommended that a shortened static URL be embedded in the QR Code that links to the final SmartLabel URL. This implementation allows the brand to make dynamic changes to the SmartLabel landing page without having to change the QR code on pack.

QR code specifications and SmartLabel logo

The purpose of this section is to provide brand owners, package designers, prepress and package print vendors with specifications to accurately implement the SmartLabel program. These specifications and guidelines are designed to promote a positive consumer experience with the program and increase their likelihood of adopting it across categories and brands.

Glossary of Terms

Module	QR codes are made up of black squares and white squares. Each of these squares is a module.
Quiet Zone	The area surrounding the QR code that should remain free of any printing.
Human Readable Interpretation (HRI)	The readable interpretation of the URL embedded in the QR code such that a user can type in the URL and get to the same destination as scanning the QR code.

QR Code Guidelines and Recommended QR Code Sizes

a. Compliance with ISO/IEC 18004 QR Code 2005 specification
b. Module width "X" value nominal size of .020".
    - GS1 recommends a module width "X" value of 1.5 times greater than the "X" value for a comparably sized UPC/EAN symbol.
    - QR Code X value scales from .015" to .040" (although with 600 DPI or higher resolution, module width could be as little as .014" but should not go below).
c. Error correction is Level M (medium level allowing recovery of 15% of embedded information.
d. Quiet zone is 4X (4 module widths). This is a region 4X wide which shall be free of all other markings, surrounding the symbol on all four sides.
e. Encoding inside the barcode of a URL leading consumers to a page related to the product the barcode is printed on.
    - URL combines a domain name and a unique product reference.
    - Domain name shall be encoded as following "http://smtlb.org" and be as short as possible, ideally 10 characters or shorter (not counting http://).
    - Domain name can be either the ones proposed by code publisher or one selected by the brand if the code publisher allows for it.
    - Embedded URLs will be determined by the brand in liaison with its selected code publisher.
f. Use of Version 2 (up to 26 characters) or Version 3 (up to 42 characters) QR barcodes
    - To create smaller size barcodes or provide the best scanning experience, Version 2 (in liaison with your code publisher) is recommended.
g. Adjust barcode width reduction (BWR) to printer specifications to ensure the best scanning experience.

Parameters		Version 1	Version 2	Version 3
Number of Modules (excluding quiet zone)		21X	25X	29X
Quiet Zone (Number of Modules)		4X	4X	4X
Maximum # of Encoded Characters		14	26	42
		QR Size Including Quiet Zone (Rounded up 2 digits after decimal)		
Module Width Size (**)	.015" (80% - UPC "X" = .0104")	.44"	.50"	.56"
	.018" (90% - UPC "X" =.0117")	.52"	.59"	.67"
	.020" (100% - UPC "X" =.0130")	.58"	.66"	.74"
	.025" (125% - UPC "X" =.0163")	.73"	.83"	.93"
	.030 (150% - UPC "X" = .0195")	.87"	.99"	1.11"
	.035 (175% - UPC "X" = .0228")	1.02"	1.16"	1.30"
	.040" (200% - UPC "X" =.0260")	1.16"	1.32"	1.48"

IMPORTANT: Do not scale the QR symbol after it has been created. Scaling will reduce the effectiveness of the bar/module width adjustment (BWR). Bar/module width reduction is very important to ensure a better scanning experience.

Recommended decision process for QR and SmartLabel logo size:

1. Decide upon the correct QR size (working with your code provider) based upon the space available and the technical specs.
2. Scale the SmartLabel logo to match the size of the chosen QR code using one of the five lockup options above
3. If BE disclosure is applicable, ensure that the placement of the QR code, the SmartLabel logo and the call-to-action statement are combined in accordance with AMS requirements.

SmartLabel Logo Colors and Association with QR Code or UPC/EAN symbol



a) SmartLabel logo may be single color, or grayscale.
b) SmartLabel logo may be two colors. If two colors, the colors are PMS P 157-7 C and P 99-16 C.
c) SmartLabel logo/QR code lock up may be printed in single color or grayscale as shown in the examples above. SmartLabel logo/icon part of the lock-up can printed in full color, with QR code in single color.



d) QR code color is determined by the brand in liaison with the code publisher.
e) HRI URL should be printed in the same color as the QR code.

Quality of SmartLabel QR code

a) Meets 1.5/10/660 on ISO15415 scale.
b) Inspection instrument meets ISO15426 specification.
c) Instrument must be calibrated to a known national standard on a scheduled basis.
d) Additional notes
    - A well-prepared package printer will maintain a timed and contemporaneous log of the inspection of each job.
    - Package printer has a “safe harbor” if above a, b, and c are accomplished.
    - GS1 recommends an “X” value of 1.5 times greater than the “X” value for a comparably sized UPC/EAN symbol.

If possible, do not place immediately adjacent to the UPC/EAN symbol.

Note on federal BE regulations:

With additional provisions for small packages and very small packages, companies have four options for disclosing BE: text, symbol, electronic or digital link, or text message.

Companies using SmartLabel to digitally disclose bioengineering must use a call-to-action (above or below the digital trigger) compliant with the final rule. Examples listed in the final rule include "Scan here for more food information," "Scan anywhere on package for more food information," and "Scan icon for more food information." In addition to these options, equivalent language that reflects technological change is permitted. The final rule provides flexibility to accommodate changes in technology.

In addition, the disclosure must be accompanied by a telephone number in close proximity to the call-to-action that will provide consumers with bioengineered food disclosure information, regardless of the time of day.

In a May 2020 letter to the American Frozen Food Institute, USDA indicated that they would allow for a single combined call-to-action statement to convey required on-pack information: "Scan here for more food information or call [1-000-000-0000]."





h. Digital watermark implementation

The digital watermarking option for SmartLabel is a visually imperceptible digital link within artwork of product packaging as opposed to an overt barcode symbol. Digital watermarking is applied to the digital artwork file of a package in a process called enhancement. This process inserts a digital payload containing a GTIN into the digital watermark which can be redundantly encoded across the entire region of the artwork designated for scanning in the consumer call-to-action. Once enhanced, the file is ready to be printed through conventional printing methods.

SmartLabel logo and association with digital watermarking guidelines

The SmartLabel logo is a combination of a symbol and logotype. One should not be used without the other. Manufacturers have flexibility on where to place the logo with digital watermarking; several options are shown for the placement of the logo with digital watermarking in the following illustration.

A call-to-action is recommended (e.g., "Scan front with SmartLabel app for more information," or "Scan [area of interest] with SmartLabel app for more information"). If a call-to-action is used, it should be located near the SmartLabel logo treatment.

Front-of-pack



Side panel



Note on federal BE regulations:

Companies have four options for disclosing BE: text, symbol, electronic or digital link, or text message.

Companies using SmartLabel to digitally disclose bioengineering must use a call-to-action compliant with the final rule. Examples listed in the final rule include "Scan here for more food information," "Scan anywhere on package for more food information," and "Scan icon for more food information." In addition to these options, equivalent language that reflects technological change is permitted.

The disclosure must be accompanied by a telephone number that will provide consumers with bioengineered food disclosure information, regardless of the time of day.

Below are two examples of how brands can use digital watermarking as links for SmartLabel on pack to be compliant. The use of [ ] for the call-to-action provides flexibility for the manufacturer to designate location/object, such as "Scan front…", "Scan rice bowl…", or "Scan package…".





Digital watermarking considerations:

Question	Consideration
Does use of a digital watermark comply with the new BE regulations?	Yes, a digital watermark meets the requirement for a digital link under the proposed BE regulations.
Do I update my packaging frequently?	Companies use packaging changes as an opportunity to add digital watermarking for little cost. The URL can be updated at any time.
Do I have frequent product changes that do not require a new GTIN?	Communicating variant information (minor product change) is easily facilitated with a digital watermark.
What if my company is already placing QR codes on the package for other purposes?	Companies can either use the QR code, digital watermarking or both together. Digital watermarking can trigger for both marketing and SmartLabel purposes with a user prompt.
Is visually communicating variant information to the consumer important to my brand?	Communicating variant information (minor product change) is more easily facilitated with a digital watermark.
Is communicating brand participation in SmartLabel to the consumer important to my brand?	The SmartLabel branding provides a strong visual indicator to a consumer that the product is participating.

Can digital watermarks that link to SmartLabel content contain more than an item GTIN?	Yes, many companies use other codes within the digital watermark to help branding, manufacturing process or traceability. This may be GS1 application identifiers or proprietary coding systems unique to the brand or for internal-only purposes. This is acceptable if the enhancement does not disrupt the consumer SmartLabel experience. The new GS1 web URI standard has been built to support this flexibility.

i. UPC barcode considerations

The following table provides a list of thought points to help guide a company through the decision of participating with only the existing UPC code that contains a GTIN to facilitate "search" and third-party, non-brand-owned app access to the SmartLabel landing page.

Question	Consideration
Does the company prefer to focus on consumers searching for product information vs. scanning for product information?	Companies that do not consider scanning as an important pathway may prefer to avoid the cost of implementing a QR code.
Can a brand use a UPC code to bring the consumer to the SmartLabel landing page?	Utilization of the UPC barcode, which does not carry a URL, requires use of a SmartLabel certified app. This path is facilitated through the use of certified app providers but carries a risk of consumers scanning the UPC with a non-certified app.
Can my package carry a SmartLabel logo if I choose not to utilize a QR code and focus on leveraging the existing UPC?	Participating item packages can carry the SmartLabel logo if it is accompanied with a call-to-action that explains that the SmartLabel app must be used.
Will it be a long time before my product labels will change?	The cost of a packaging change just to implement a QR with SmartLabel branding may not be justified.
Is my packaging space constrained?	Companies that have limited space for adding a new code may choose to use the UPC code/structured data to enable "search" as the only consumer path.

j. Partnering with third-party websites pathway

Another way to expand consumer access to SmartLabel landing pages is via a partnership approach with third-party, non-brand owned websites and apps.

The SmartLabel brand office will certify a third-party, non-brand owned website or app and enable that website or app to carry the SmartLabel logo if that participant agrees to:

- Source its required and voluntary attribute information directly from a SmartLabel participating brand owner, the brand owner's approved agent, or via the GS1 Global Data Synchronization Network.
- Enable the consumer to access the brand's landing page in two clicks or less. This implies that the consumer either leaves the retailing website or app and goes to the brand owned SmartLabel landing page, or the landing page (with full functionality) is available via a pop-up or in-app browser.
- An app provider must agree not to redirect any digital link scans for SmartLabel participants.

An API to the SmartLabel product search database is available. This API allows third-party, non-brand owned website and app providers to carry the SmartLabel logo and link to product SmartLabel landing pages.

Interested third-party, non-brand owned website and app providers should contact the SmartLabel brand office for more information.

A SmartLabel third-party terms of use and licensing agreement governs the API access and requirements.

XI. Other considerations

a. Hosting the SmartLabel landing page

The hosting of the landing page is the responsibility of the brand owner. There are several options available.

- **Brand hosted:** The brand owner may host the landing page and assume responsibility for development and maintenance in accordance with the SmartLabel style manual, including supporting performance and availability standards. As SmartLabel evolves and the style manual is updated, the brand owner is responsible for updating the landing page to maintain consistency for the consumer across the industry.

- **Vendor supported:** The brand owner may engage a third-party vendor to develop and support the landing page. The brand owner is responsible for ensuring that the vendor complies with the style manual and makes appropriate updates.

- **Turnkey vendors:** The brand owner may use a SmartLabel compliant vendor turnkey solution for the SmartLabel landing page. In this option, the vendor is providing a common solution for many brand owners and, as part of that service, guarantees to the brand owner that the solution will remain compliant with the SmartLabel style manual, including updates.

b. Embedding the SmartLabel landing page into third party (e-commerce) sites

The SmartLabel program encourages integration with retailer e-commerce sites to gain exposure both for the brands and for SmartLabel. Properly preparing SmartLabel pages for embedding into third-party sites is essential.

Embedding an iFrame (Inline Frame) is a widely used technique to include external content within a website. When working with iFrames, it is essential to consider Cross-Origin Resource Sharing (CORS) security to ensure the proper handling of content from different origins.

By following the step-by-step instructions below and verifying the CORS support of the embedded content, you can securely incorporate external content into websites. Remember to respect content usage rights, comply with CORS policies, and adhere to applicable legal and ethical guidelines when embedding and interacting with content from different origins.

Step 1: Understand the iFrame Tag and CORS

The iFrame tag is an HTML element used to create a container for embedding external content. CORS is a security mechanism implemented by web browsers to protect against cross-origin requests that could pose potential security risks. It is particularly relevant when embedding content from a different domain, protocol, or port.

Step 2: Determine CORS Support

Before embedding content, ensure that your external product pages support CORS. CORS headers must be correctly configured on the server hosting the content (i.e., where your product pages reside) to allow cross-origin requests. The server should respond with appropriate Access-Control-Allow-Origin and Access-Control-Allow-Methods headers to grant access to specific domains or all domains, e.g., "products.mycompany.com."

Learn more about these CORS headers here: https://developer.mozilla.org/en-US/docs/Web/HTTP/Headers/Access-Control-Allow-Origin

Step 3: Obtain the URL of the Content

To embed the desired content (SmartLabel page), make sure you have the correct page URL. Verify that the page you wish to embed permits embedding and cross-origin requests by examining its CORS configuration.

Step 4: Create the iFrame

Create the iFrame element using the obtained URL. Place the iFrame tag within the appropriate section of your HTML document, such as the body section, where you want the embedded content to appear. Ensure that the iFrame tag structure includes the necessary attributes to customize the behavior and appearance of the embedded content.

Example:

```
<iframe src="https://www.example.com"></iframe>
```

This example creates an iFrame and embeds the content available at the URL "https://www.example.com".

Step 5: Adjust the iFrame Attributes (Optional)

You can customize the appearance and behavior of the embedded content by utilizing various attributes available for the iFrame tag. However, be mindful that certain attributes, such as sandbox, can provide additional security measures by restricting certain operations within the iFrame.

Learn more about IFrame attributes here:

https://www.w3schools.com/tags/tag_iframe.ASP

Step 6: Test and Handle CORS Errors

Preview your webpage in a web browser to view the embedded iFrame and verify that it works as intended. CORS errors such as “Access to XMLHttpRequest at ‘URL’ from origin ‘YourDomain’ has been blocked by CORS policy” indicate that the embedded content does not support CORS or the CORS configuration is insufficient. In such cases, you may need to consult the external website’s documentation or contact its administrators to resolve the CORS issues.

XII. Data Management

Data management is crucial to the success of SmartLabel. It influences two primary pieces of SmartLabel's success:

1) Seamless, accurate information flow to the SmartLabel landing page and others who use the data.
2) Getting the user to the SmartLabel landing page.

Seamless, accurate information flow

SmartLabel is built on the foundation of GS1 standards and the Global Data Synchronization Network (GDSN). There are clear roles for participating data providers (brands/item GTINs) and data recipients (retailers, retailer e-commerce sites, third-party data aggregators and third-party apps).

Storing and maintaining the data accurately is the brand owner's responsibility. Using a Product Information Management (PIM) system is recommended, but not required for SmartLabel.

Information contained on SmartLabel landing pages may be subject to regulation such as labeling and advertising under federal and state law, including laws administered by the FDA, USDA, and FTC.

NOTE: It is the responsibility of the participating brand to ensure that the information provided on SmartLabel landing pages is complete, accurate and provided in accord with applicable regulatory requirements.

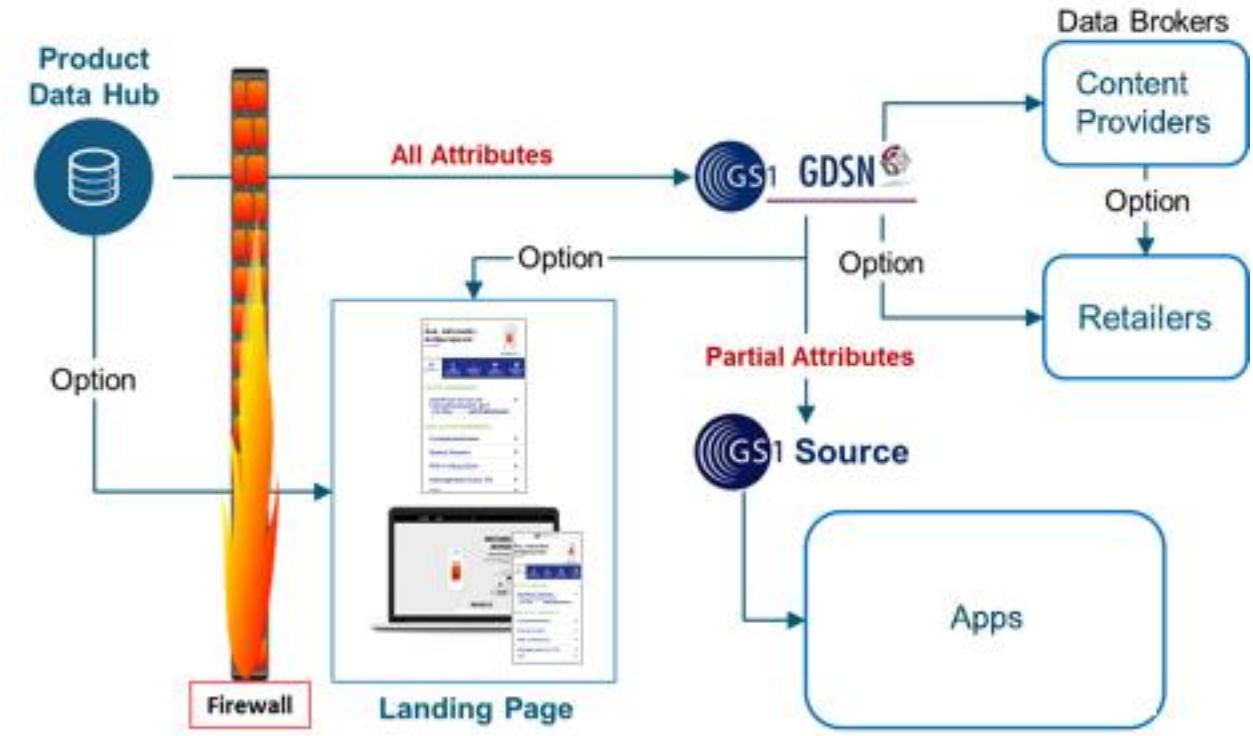
There are three options for providing the data to a SmartLabel landing page. Brand owners can choose any or all these options.

1. Providing required and voluntary attribute information through a Global Data Synchronization Network (GDSN) certified data pool and back to the item's Landing Page. This information flow ensures synchronized data to the item's landing page with information or updates going to other brand identified tools and solutions, such as GS1 Source certified data aggregators. This is a recommended best practice.
    - This requires GDSN participation for both the data providers and the data recipients.
    - This method leverages an existing capability for companies already participating in GDSN.
    - Companies can source the data from the same feed that sends the data to GDSN or from GDSN directly.
    - Data can be set up to automatically feed from a GDSN certified data pool to a GS1 Source certified data aggregator (e.g., provide data once).

- Retailers, eTailers, marketplaces and apps can source the URL for the brand owned landing page from the data aggregators (e.g., provide data once) via a simple application programming interface (API).

2. Provide required and voluntary attribute information through a GS1 Source certified data aggregator.
    - Does not require GDSN participation.
    - Companies can source the data from the same feed that sends the data to GS1 Source, or from a GS1 Source certified data aggregator directly.
    - Retailers, eTailers, marketplaces, and apps can source the URL for the brand owned Landing Page from www.smartlabel.org via a simple application programming interface (API).

3. Provide required and voluntary attribute information directly to the brand owned landing page.
    - Does not require participation with a third-party service
    - If this is the only data flow path, items will need to engage each Retailer, eTailer, marketplace, and app if they want to share the URL for the brand owned landing page. Alternatively, the brand owner could also provide data to external parties through option one or option two.



Data standards

Regardless of how a company chooses to syndicate data, all attributes must be defined according to GS1 standard and formatted according to the SmartLabel guidelines. All SmartLabel attributes have a GS1 standard.

Attributes that are syndicated via GDSN are required to be maintained according to GS1 standards. Brand owners or web hosting providers must modify data formatting display according to the requirements in the SmartLabel style manual.

If a brand owner chooses not to syndicate data, it is still recommended that the data be stored according to GS1 formatting standards to simplify future data integration options. At a minimum, the data attributes must be defined according to GS1 standards and presented to the consumer in accordance with the SmartLabel formatting requirements found in the style manual.

Getting started

If your company is not currently using GS1 standards or participating in GDSN visit http://www.gs1us.org/get-started for more information about obtaining a license for a GS1 Company Prefix and using GDSN.

XIII. Governance

a. Overview of Governance Rules

Governance rules are intended to assist brand owners with maintenance and application of product information within the SmartLabel environment. These rules describe how participating manufacturers, retailers, regulatory entities and other will interface with SmartLabel and be enforced by the SmartLabel brand office.

Governance rules will play two main roles:

1) They communicate principles intended to drive accurate, timely, complete, and representative attributes of the brand owner's physical product within the SmartLabel environment.
2) They help maintain integrity of the SmartLabel environment within a standardized framework of data attributes, landing page and style guidelines, and principles of transparency.

Governance rules include guidance pertaining to:

- **Brand owner participation:** How brand owners can participate and what is required of them.
- **SmartLabel brand logo:** How to determine and use the appropriate SmartLabel brand and carrier symbol on pack and/or within a brand's website for participating item GTINs.
- **Product attributes:** Which product attributes are supported by SmartLabel and how to treat those that are voluntary and those that are required, as well as requests for modifications to the existing voluntary/required attribute lists for both food and non-food products.
- **Marketing via SmartLabel:** Distinctions between information found within the SmartLabel landing pages and information found outside the SmartLabel environment is clearly defined. **SmartLabel is not a marketing medium** and this distinction will help reinforce that fact to consumers.

Information contained on SmartLabel landing pages may be subject to regulation as labeling and advertising under federal and state law, including laws administered by the FDA, USDA, and FTC. It is the responsibility of the participating brand to ensure that the information provided on SmartLabel landing pages is complete, accurate and provided in accord with applicable regulatory requirements.

b. Governance rules details

Manufacturer participation

- Broad participation is encouraged; however, manufacturers are not required to participate.
- Membership in an industry association (e.g., CBA, FMI, etc.) is not required for participation in the SmartLabel initiative. However, the fee structure for participation will differ for non-member organizations.
- SmartLabel will always be at an Item/GTIN level. Brand owners can choose to implement item GTINs one-by-one or in a phased approach at the brand family or category level.

SmartLabel brand logo/carrier symbol

- Brand owners must use an approved version of the SmartLabel brand logo/carrier symbol, as defined in the SmartLabel style manual. Alterations, other than size, are prohibited.
- The SmartLabel brand logo/carrier symbol must be visible on the consumer package (i.e., the package scanned at checkout) in a size and location that is easily identifiable to the human eye and readable by electronic technologies such as those available to consumers on a smartphone.

Product attributes

- SmartLabel product attributes are aligned to GS1 standards.

- SmartLabel product attributes are divided into two categories:
  - **Required attributes** are those that brand owners must include for all participating Item GTINs.
  - **Voluntary attributes** are those that brand owners include at their own discretion for participating Item GTINs. However, if included, they must adhere to the GS1 Global Data Dictionary Standard and SmartLabel implementation guidelines.

    Where item GTINs choose to use voluntary attributes with a custom text description, the item must include the notification **"Definition provided by [definition provider]"**

- The required and voluntary attributes may change with subsequent releases of SmartLabel.

- Product attributes, such as claims and certifications, that are described or monitored by third parties must be attributed to that third party through a link.

- Brand owners are only allowed to convey attributes on the SmartLabel attributes lists within the SmartLabel environment. The consumer interface to SmartLabel will offer a link that allows the consumer to leave the SmartLabel environment and enter the brand's marketing site. The SmartLabel interface will notify the user that they are leaving the SmartLabel environment to enter the brand's marketing site.

- Attributes for which the order of display is not regulated should be presented as follows:
    - **Required attributes must be displayed first**, and in the order specified by the manufacturer.
    - **Voluntary attributes should follow**, in the order specified by the manufacturer.

- Required and voluntary attributes must appear with the same visual treatment.

Program evolution and maintenance

- Brand owners, retailers, regulatory bodies, consumer groups, etc., may submit suggestions for changes, additions. or deletions to the SmartLabel brand office. The SmartLabel team will decide whether the suggestion is approved and the effective date upon which a change will take effect.

- To ensure consumer confidence in the integrity of the SmartLabel initiative, brand owners are expected to maintain an accurate linkage between product images and attributes with the associated SmartLabel carrier symbol appearing on each package. Brand owners are therefore expected to issue a new carrier symbol when product images and/or attributes associated to a previous carrier symbol no longer convey accurate information. For example:

    - Any Item GTIN image appearing on a SmartLabel landing page must accurately match the product that was scanned. When package graphics no longer reasonably match the image in SmartLabel a new carrier symbol should be issued.

    - Likewise, brand owners are expected to issue a new carrier symbol when attributes have changed to the extent that a new dataset is required to ensure the continued accuracy and integrity of information conveyed via SmartLabel.

    - Similar standards should be applied by manufacturers who apply the SmartLabel logo to a brand's website.

Governing body

- To ensure the program maintains a consistent consumer experience, the SmartLabel brand office will use these rules to conduct regular audits of participating item GTINs to audit compliance to the governance rules. Governance rules will be revised as needed.

c. Marketing via SmartLabel

SmartLabel is not a medium for marketing, promotions or offers. It is intended to convey approved attributes that aid shoppers in their knowledge and understanding of participating products.

The consumer interface to SmartLabel will offer a link that allows the consumer to leave the SmartLabel environment to enter the brand's marketing site. The SmartLabel interface will notify the user that they are leaving the SmartLabel environment to enter the brand's marketing site.

The brand's marketing site is not endorsed by nor supported by SmartLabel.

NOTE: SmartLabel is not a forum for brand owners to make superiority claims vs. competitive brands.

Participating brand owners may place an approved SmartLabel logo on brand owned products and/or web pages for items that participate in the SmartLabel initiative. It is expected that scanning or clicking on that logo will bring the consumer to an authorized SmartLabel web page that adheres to the SmartLabel governance rules.

XIV. Additional Resources

The following resources are available on the portal for brands at www.smartlabel.org or by request from the SmartLabel office.

Product attribute data sheets

- 3.1 Food and Beverage Attribute List
- 3.1 Dietary Supplements Attribute List
- 3.1Pet Food Attribute List
- 3.1 Personal Care and Household Cleaning Attribute List
- 3.1 OTC and Medical Devices Attribute List

Landing page resources

- High resolution SmartLabel logo image files.

Technology and data management

- How to get started with GS1 standards: If your company is not currently using GS1 standards or participating in GDSN, visit http://www.gs1us.org/get-started for more information about licensing a GS1 Company Prefix and using GDSN.
- GS1 Global QR Code Considerations document

Consumer research

- SmartLabel consumer research infographic.

Securing a SmartLabel trademark license

- A SmartLabel trademark license is available via the brands@smartlabel.org office.
- A license must be secured for every item with a SmartLabel landing page.
- A participating SmartLabel item must execute SmartLabel consistent with the range of acceptable options outlined in this implementation manual.
    - Participating item GTIN landing pages and packages will be periodically audited.
- Licensing fees are assessed annually and are based on the number of SmartLabel pages in a tiered pricing model.
- Third-party apps, informational, or retailing websites can be granted a SmartLabel license if the consumer can get from the site to the brand-owned SmartLabel landing page in two clicks or less.
    - A terms and use agreement must be signed but there is no fee for this arrangement.

Accessibility

- For more information on building accessible pages, including voluntary compliance with the Americans with Disabilities Act of 1990, please consult the Web Content Accessibility Guidelines developed by W3C's Web Accessibility Initiative.

Vendor taxonomy

- Overview of knowledge partners that can assist with SmartLabel.

Voluntary Resource Guides

- Three voluntary resource guides spanning the following topics are available on the portal for brands at www.smartlabel.org.

    - Farm Animal Husbandry and Sustainable Agriculture (FAHSA) ingredient and claim descriptions.
    - Food ingredient descriptions.
    - Fragrance ingredient descriptions.
    - Personal care and household product ingredient descriptions.

XV. Appendix A Best Practices

Introduction

To help SmartLabel participating companies meet both program requirements and regulatory compliance, our team has identified the following best practices for SmartLabel landing page executions:

1. Required attributes
2. Voluntary attributes
3. Brand website or E-commerce integration
4. SmartLabel branded digital trigger on pack
5. Typography, design, and layout including header and footer information

These best practices are intended to promote consistency in the way brands display information and to encourage the use of voluntary attributes that go beyond the label to better inform and engage consumers. Leverage your investment in SmartLabel by making the most of your pages to connect with consumers.

a. Style Manual Compliance and Voluntary Information

Compliance with the design specifications in the SmartLabel Implementation Manual is required. Adherence to the standards for typography, layout and design is critical to achieving a consistent experience for the consumer across all product categories. Providing voluntary information that goes beyond the label to inform and engage consumers is equally as important.

The following are recommended best practices for SmartLabel pages in the food and beverage category. They are derived from an interactive SmartLabel template that has been created to display best practices in the development of SmartLabel pages. These examples are not exhaustive and are meant for illustrative purposes only. *This Best Practices document will be disseminated only to SmartLabel participants and prospects who have signed the SmartLabel Licensing Agreement*. If you have questions or additional suggestions for best practices, please send them to either Rishi Banerjee or Nancy Moskowitz.

Scan the QR code to access the SmartLabel Food and Beverage interactive template:

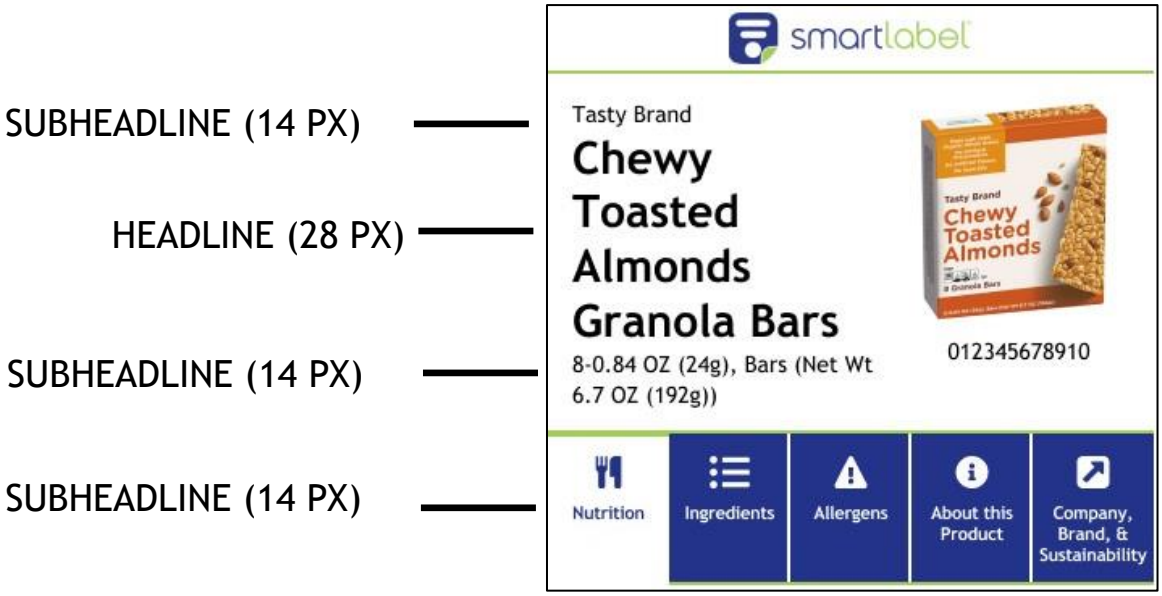


Landing Page - Header

Best practices for the landing page include:

1. Marketing image of the product
2. General information about the product (such as the UPC/GTIN, brand, sub-brand, flavor, and product description)
3. Size information
4. Federally mandated declarations (e.g., inspection legends for meat) and the USDA BE disclosure symbol or text statement, as applicable.

Refer to the Type Hierarchy section of the Food and Beverage Implementation Manual for appropriate type size.



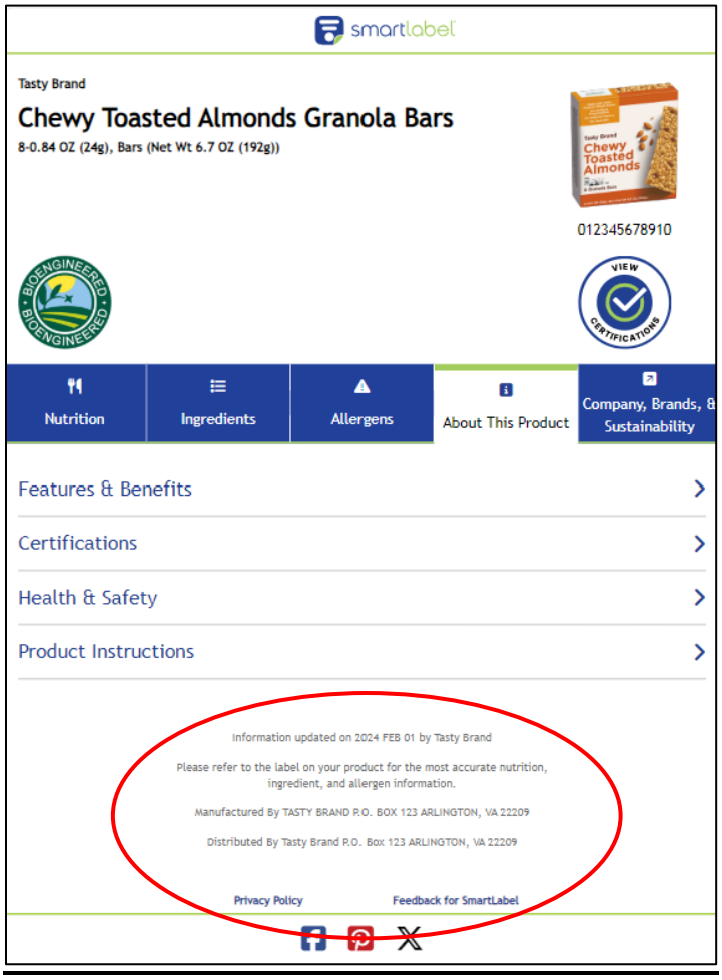
Landing Page - Footer

The bottom of the screen must contain a footer section with information in the following order:

1. **Optional:** Statement instructing the consumer to refer to the product packaging for the most up-to-date product information.
2. **Required**: Date of updates to the landing page: "Information updated on [Date] by [Company Name]. The timestamp must follow the DD-MMM-YYYY format.
3. **Required**: Manufactured by statement: "Manufactured by [Company]" and/or
4. **Required**: Distributed by statement: "Distributed by [Company], [Company Address]

5. **Required:** Company Privacy Policy and Feedback for SmartLabel links on one line. The Privacy Policy must link to the company's privacy policy. **The Feedback for SmartLabel prompt must link to the Contact Form on www.smartlabel.org.**
6. **Optional:** Social media icons with links to the company's social media platforms. Social media links should allow the user to share the landing page on their own social media platforms.

Maintaining and updating the SmartLabel pages on a regular basis is a best practice. The timestamp in the footer informs the consumer that the brand is providing timely and accurate information. ***Updating your SmartLabel pages every 6 months or when there are product changes is recommended. Check all hyperlinks regularly to ensure they are working.***

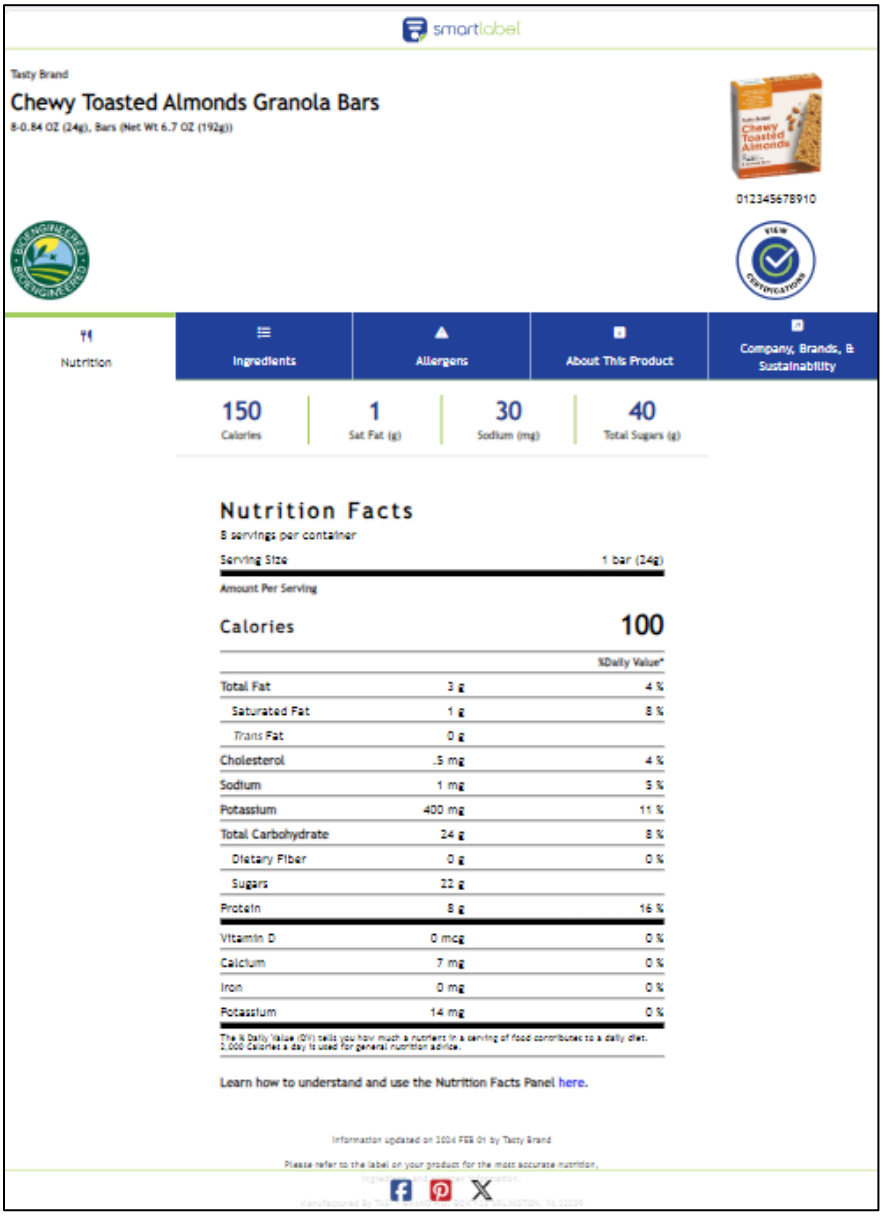




Nutrition Tab

The Nutrition Panel in SmartLabel must conform to the FDA's Nutrition Facts Panel and include Facts up Front (calories, saturated fat, sodium, and sugar). All four Facts up Front attributes must be displayed, even if the value is zero.

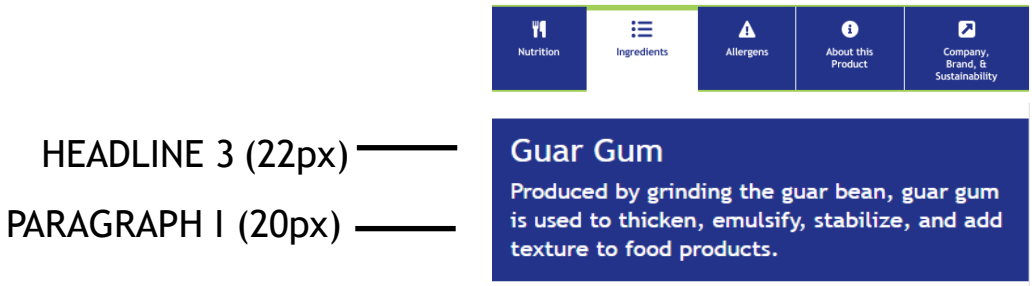
The Nutrition Facts Panel must exactly mirror what appears on the physical package for single column displays, including dividing lines, relative font sizes, indentations, alignment, and separation bar-width. Below the Nutrition Facts Panel, prominently display the statement "Learn how to understand and use the Nutrition Facts Panel here," which links to the FDA interactive explanation of the Nutrition Facts Panel.

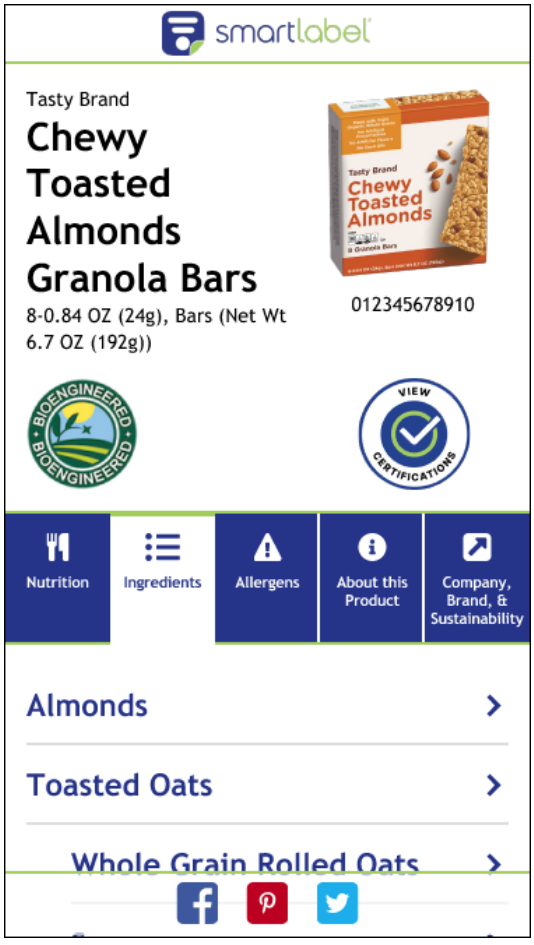


Ingredients Tab

Ingredients **must** be listed in order of predominance and appear in a **stacked format**, which is easier for the consumer to read and facilitates ingredient drilldowns to voluntary information**.** Ingredients must be listed in order of predominance and mirror the ingredient list on the package. They must comply with federal and state legislation. ***Including voluntary information such as ingredient definitions, sourcing and country of origin is highly recommended.***

Ingredient definitions must be white type on the SmartLabel blue background:





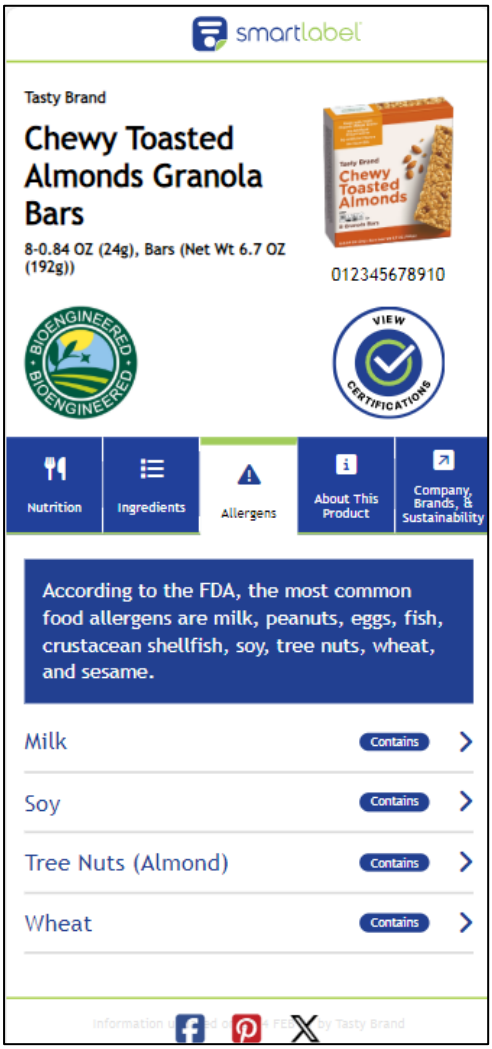


Allergens Tab

At the top of the Allergens tab is fixed copy that reads, “According to the FDA, the most common food allergens are milk, peanuts, eggs, fish, crustacean shellfish, soy, tree nuts, and wheat." This copy should be white on the SmartLabel blue background in Paragraph 1 (20px) type size.

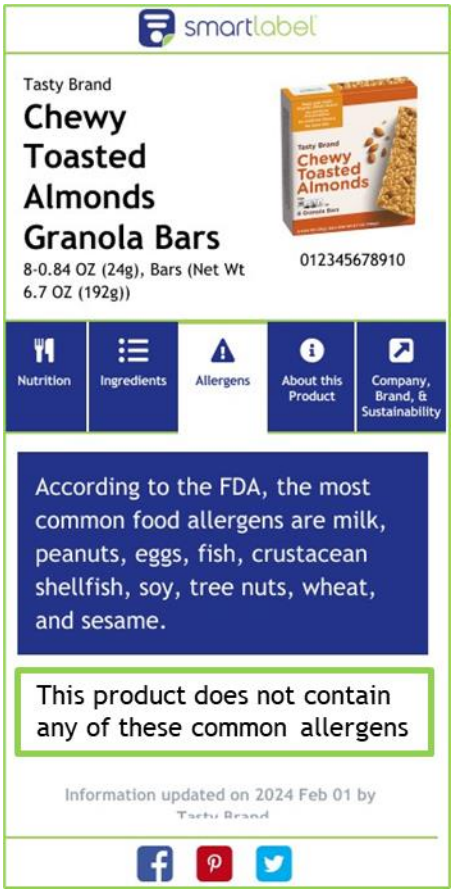
All allergens in the product ingredients must be listed in a stacked format. It is a best practice to link the allergen information to the Food Allergy & Research Education (FARE) website.

Blue ovals with white type should be placed just before the arrows linking to an additional page with the explanation of the allergen disclosure. Note there are ovals for **Contains, May Contain and Shared Facility**.



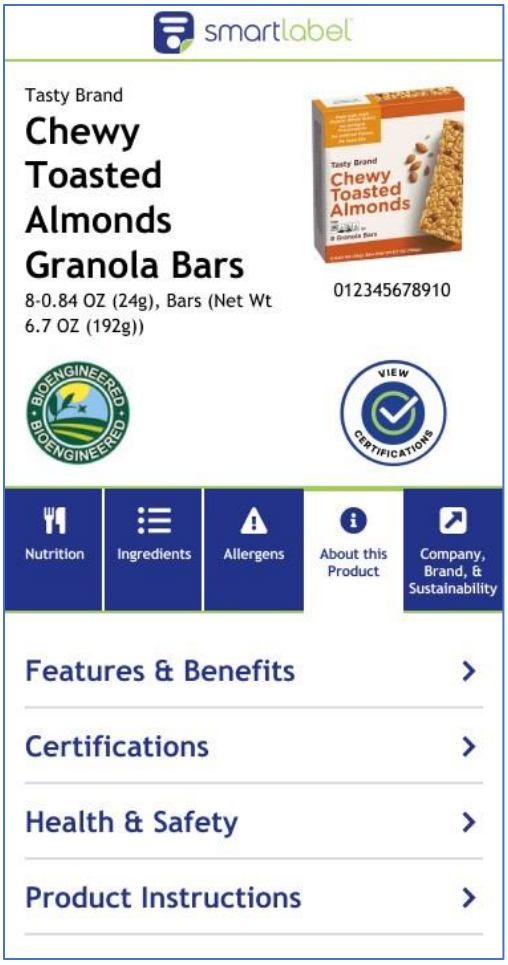


If none of the top allergens is present in the product, the text should read "This product does not contain any of these common food allergens," as in the example below:



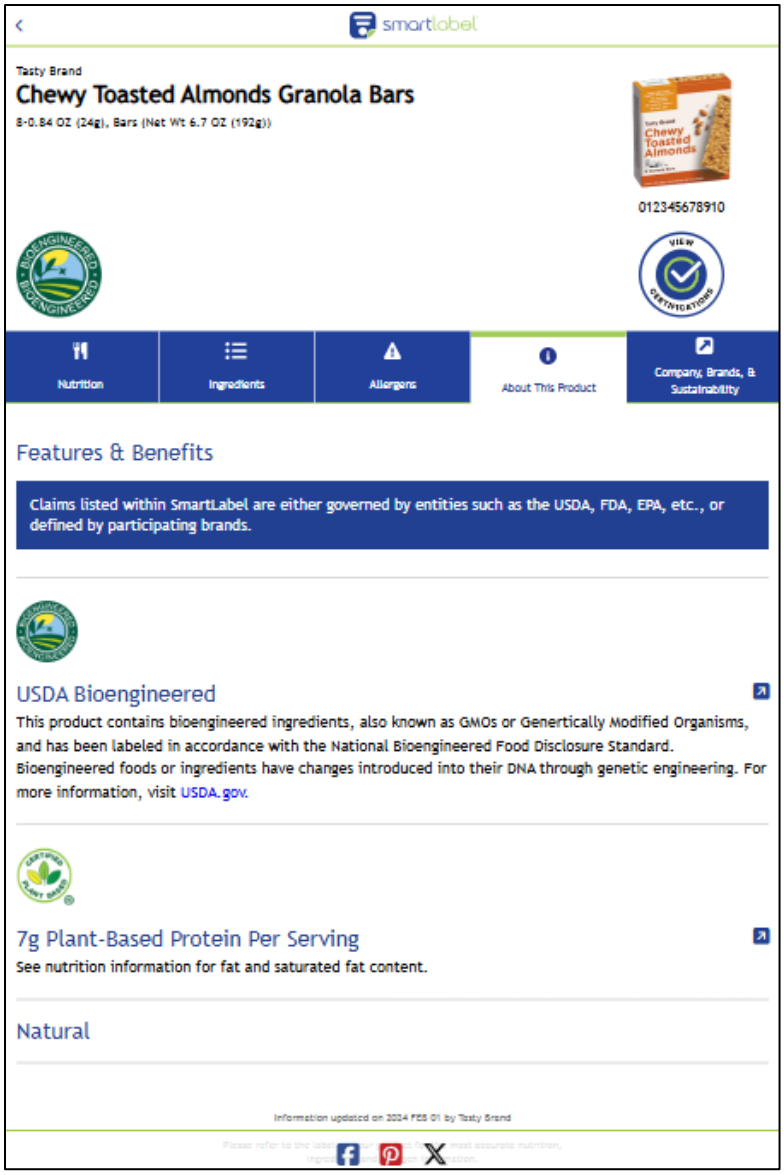
About this Product tab

The About this Product tab is where most of the voluntary attributes reside. It is the brand's opportunity to provide information that cannot be found on the label. It is a best practice to include voluntary information under all four subcategories on this page:



Features & Benefits

This section contains voluntary attributes pertaining to nutrient content claims, ingredient absence statements, compositional claims, origin statements, method of production, growing methods, and so on. All claims are voluntary attributes and will be displayed in an **alphabetical list**. The statement "Claims listed within SmartLabel are either governed by the entities such as the USDA, FDA, EPA, etc., or defined by participating brands" **must** appear in a blue box with white lettering at the top of the Feature & Benefits tab.



Certifications

This section contains information about third-party certifications, quality marks or item grades (such as “Grade A”), economically related certifications such as “Fair Trade” and “Dolphin Safe”, and food safety certifications.

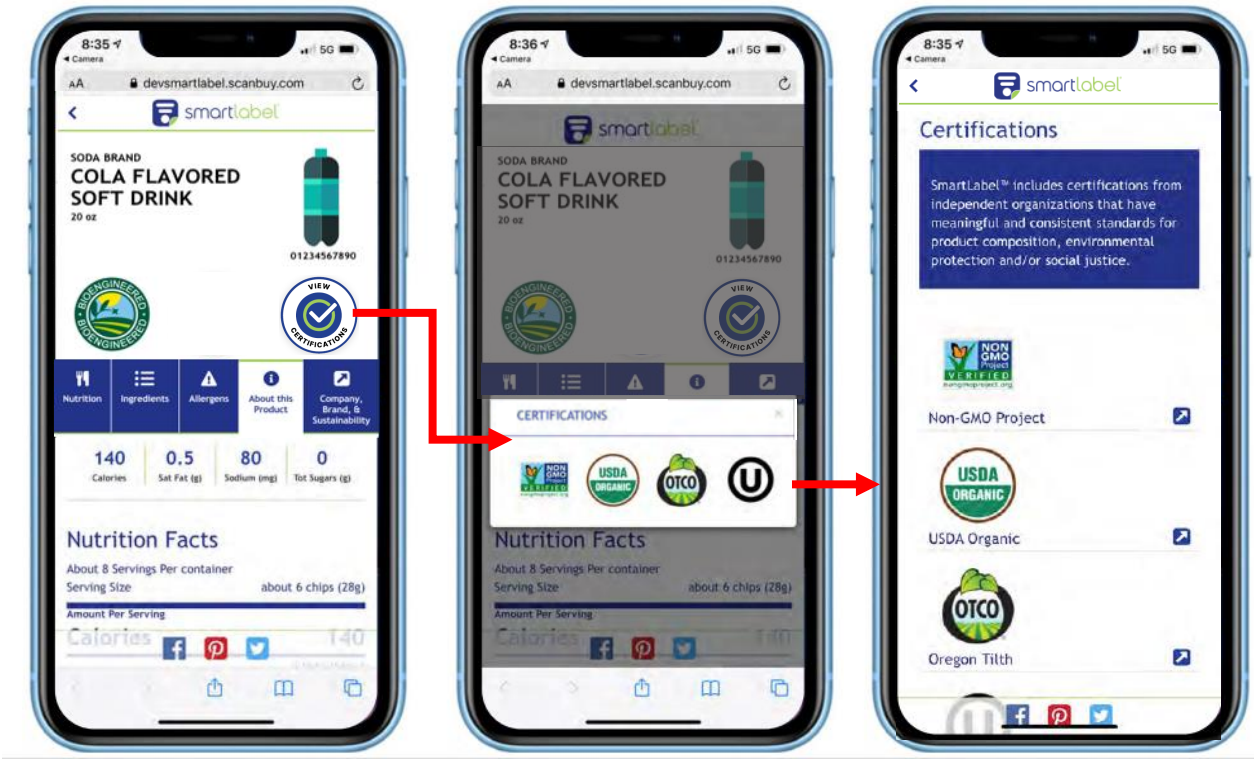
The statement “SmartLabel includes certifications from independent organizations that have meaningful and consistent standards for product composition, environmental protection and/or social justice” **must** appear in a blue box with white lettering at the top of the Certification page.

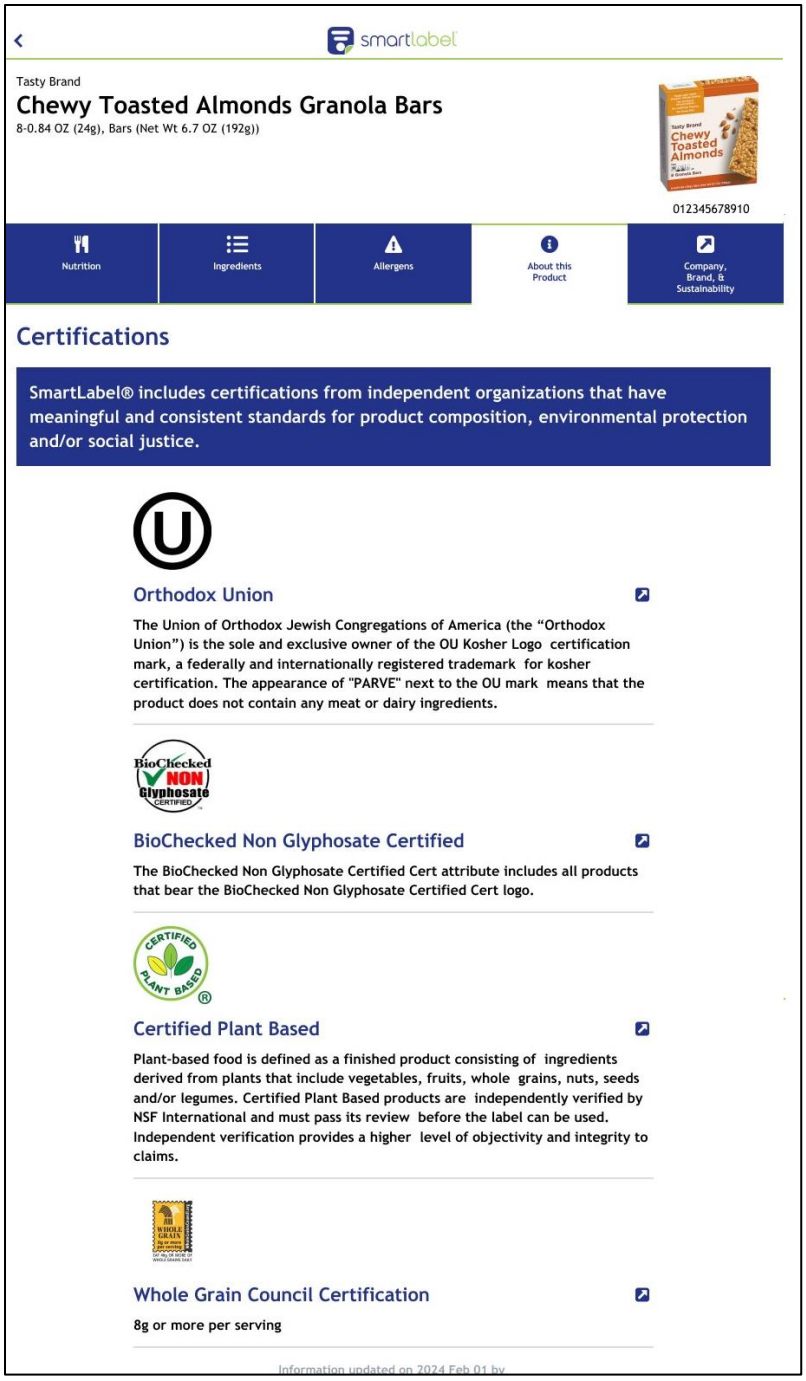
It is a best practice to place for brands that wish to highlight their third-party product certifications to place the certification badge depicted below in the header, indicating to the consumer that the badge can be clicked to display more information.



The badge **must** be placed on the far right side of the header below the product image and GTIN as illustrated below.

When the consumer clicks on any of the certification badge, it triggers an iframe that displays the product certification symbols as in the example below. The certification symbols can be linked to additional information about the certifications on the About this Product tab.



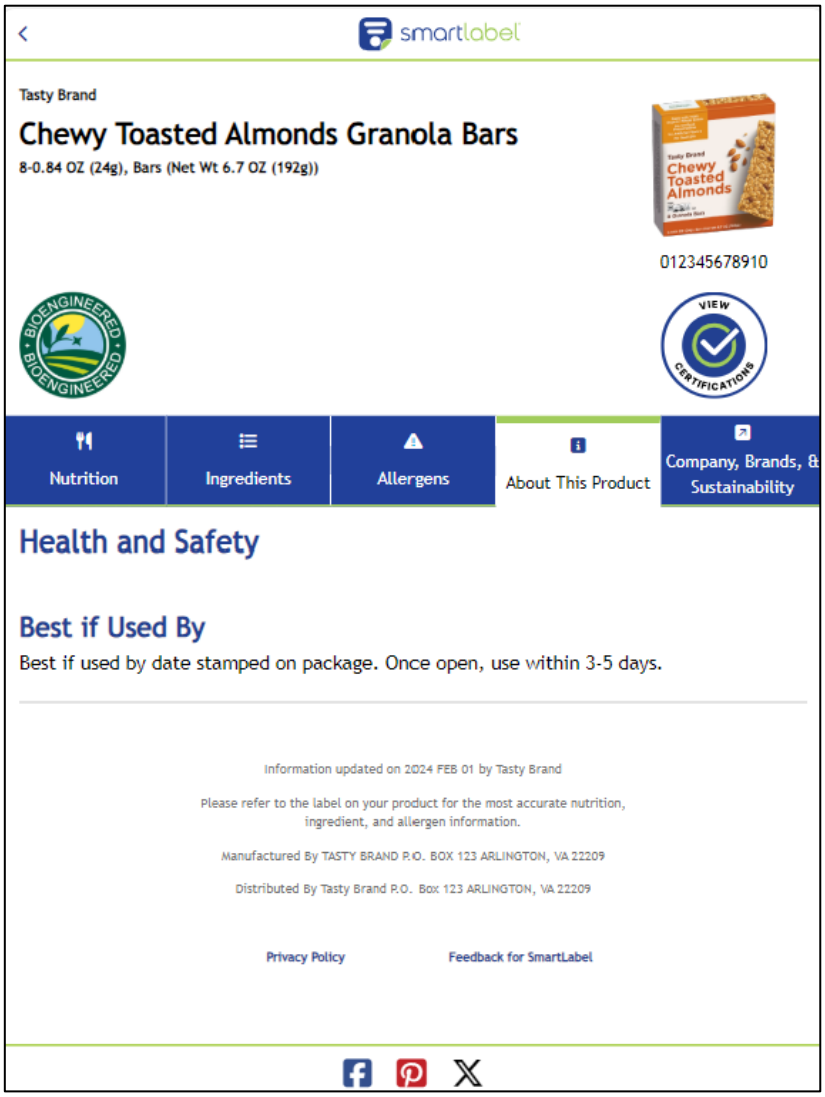


Health and Safety

This section contains information about **precautions and warnings, product safe handling, temperature ranges for safety, and health claims.** Refer to the Food and Beverage Attribute List for a complete set of attributes that can be displayed under this category. It is a best practice to include voluntary information under this subcategory.

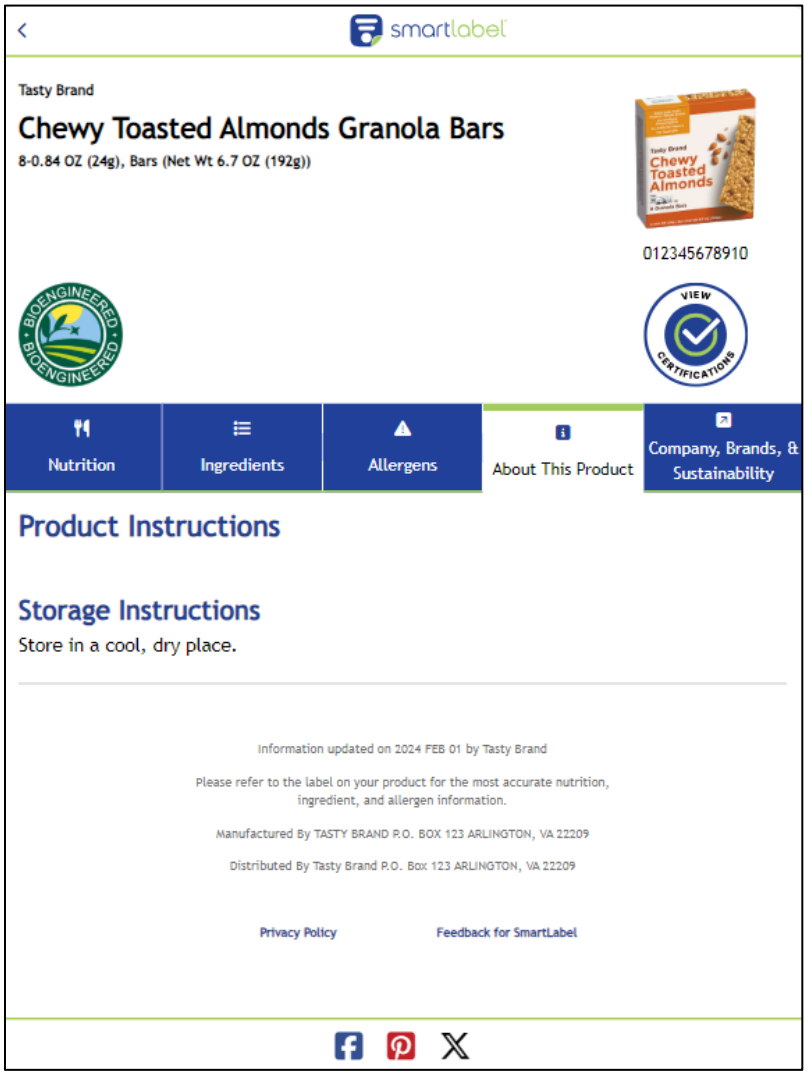
Required attributes under this section must be displayed first. These include **precautionary or warning statements** required by regulation and safe handling statements.

Voluntary attributes in this section must be listed next. Effective January 2020, product code dating explanations are limited to the CBA/FMI Product Code Dating Standards: “BEST if Used By” and “USE By”.



Product Instructions

This subcategory offers multiple ways to **keep the consumer engaged** with voluntary attributes relating to **storage, preparation, cooking instructions, serving suggestions and recipes**. Refer to the Food and Beverage Attribute List for a complete set of attributes that can be displayed under this category. It is a best practice to include voluntary information under this subcategory.

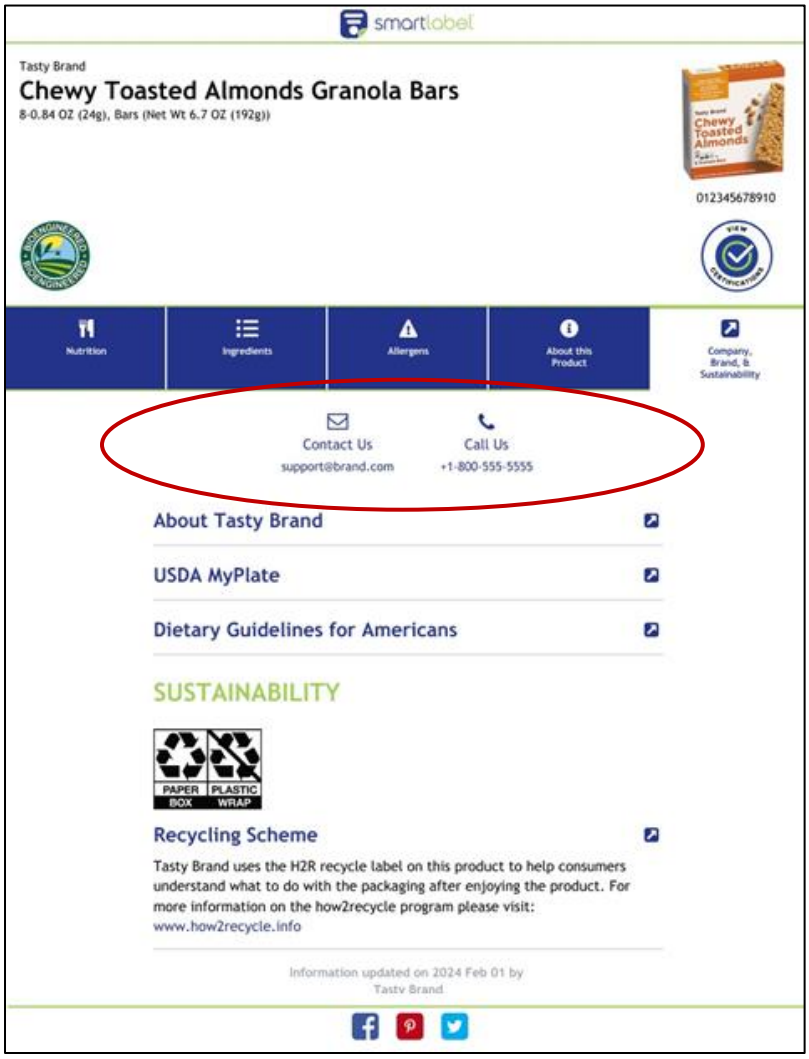


Company, Brand & Sustainability Tab

This section is where brands can continue to engage with the consumer by providing hyperlinks to the brand and/or company website pages. Sustainability attributes are also located on this tab.

Company Contact Information

Under this tab, **the company contact information for Customer Support must be displayed at the top of the page**. The Contact Us icon must link to the brand's online contact form or a prepopulated email to customer support. The Call Us icon should display the customer service phone number.



The Call us icon can display the customer support telephone number when clicked or link to an online prompt to call.

The brand may choose to list the hours this is available (e.g., “Call us anytime 8 a.m. – 6 p.m. EST”). Email and phone links must be usable from the user’s device

Below the contact information, brands can insert hyperlinks to **their brand and company** websites, and to **third-party resources**.

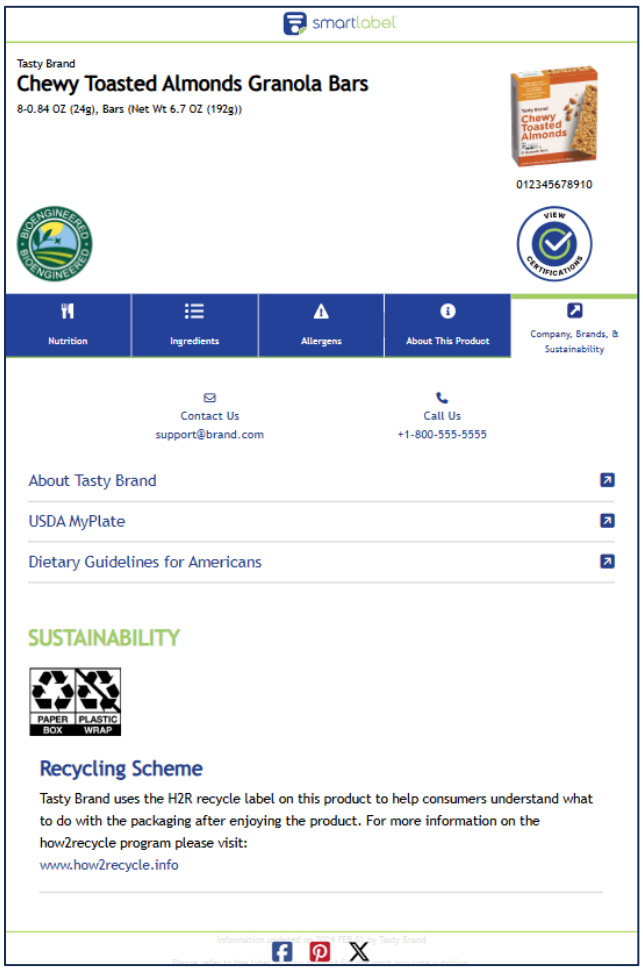
When one of these links is selected, there must be a notification that they are leaving the SmartLabel site.

Sustainability Attributes

It is a best practice to include sustainability attributes and information on brand or corporate sustainability initiatives on the Company, Brand & Sustainability tab.

Guidance on how to display sustainability attributes is available in the Food and Beverage Implementation Manual and Food and Beverage Attributes List respectively.

Sustainability attributes may be displayed directly on the Company, Brand and Sustainability tab and can include links to How2Recycle and corporate sustainability practices. When hyperlinks are used, the **“leaving SmartLabel” notification** must appear.



b. Digital Trigger on Pack

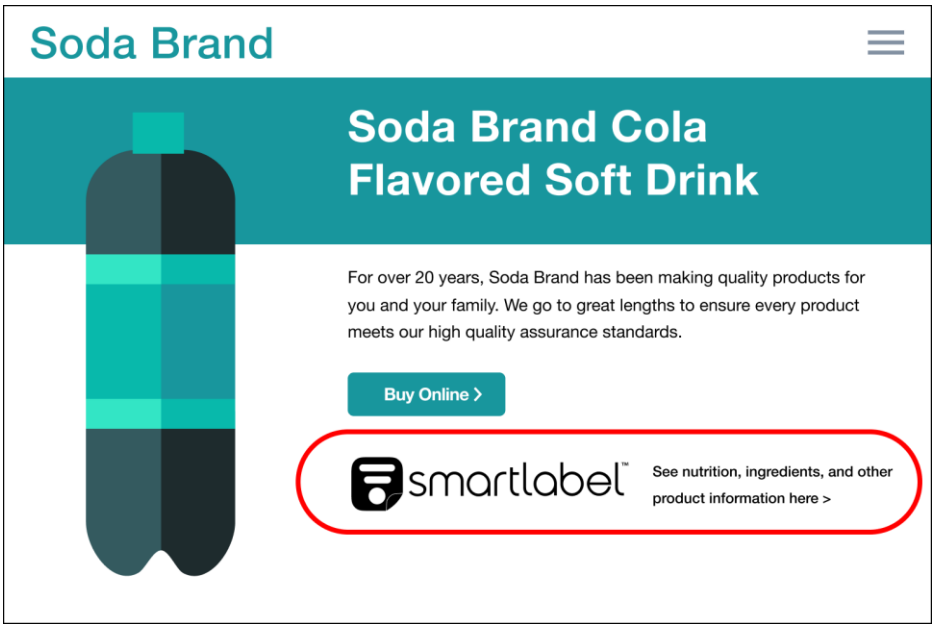
Smartphone use has become ubiquitous in every adult age group and demographic in the U.S. QR code readers embedded in iOS and Android phones are driving broad expansion of QR codes in general, and on packaging for brands to engage with their consumers ("connected packaging"). Moreover, COVID-19 has driven new use cases for digital links to consumer information, thus increasing consumer familiarity and adoption. In 2024, QR codes accounted for nearly 22 million SmartLabel page views.

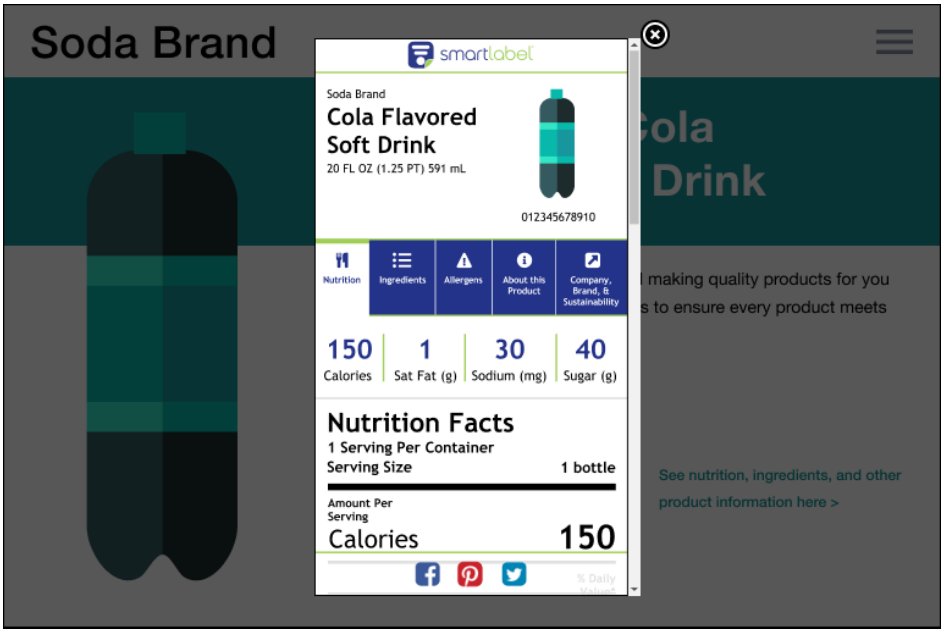
QR codes on packaging are recommended as a SmartLabel best practice. See the SmartLabel Over-the-Counter (OTC) Products Implementation Manual for use of the QR code and SmartLabel logo on packaging.

c. Embedding SmartLabel on Brand Website

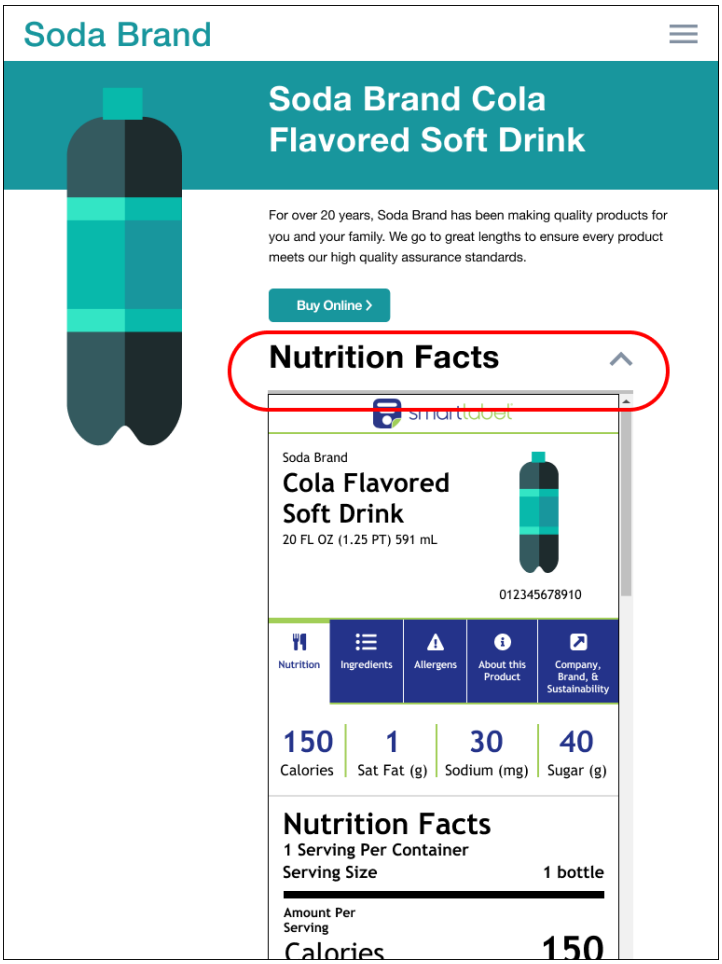
Embedding SmartLabel in your brand website pages is a recommended best practice for keeping consumers engaged while remaining on your product page. The recommended approach is to embed the page in a pop-up or wireframe. See Embedding the SmartLabel landing page into third party (e-commerce) sites for directions on how to prepare your pages to be properly embedded.

- **Pop-up**




Soda Brand
smartlabel
Soda Brand
Cola Flavored
Soft Drink
20 FL OZ (1.25 PT) 591 mL
012345678910
Nutrition
Ingredients
Allergens
About this Product
Company, Brand, & Sustainability
150
Calories
1
Sat Fat (g)
30
Sodium (mg)
40
Sugar (g)
Nutrition Facts
1 Serving Per Container
Serving Size
1 bottle
Amount Per Serving
Calories
150
making quality products for you
s to ensure every product meets
See nutrition, ingredients, and other
product information here >

- **Wire Frame**


Soda Brand
Soda Brand Cola
Flavored Soft Drink
For over 20 years, Soda Brand has been making quality products for you and your family. We go to great lengths to ensure every product meets our high quality assurance standards.
Buy Online ›
Nutrition Facts
smartlabel
Soda Brand
Cola Flavored
Soft Drink
20 FL OZ (1.25 PT) 591 mL
012345678910
Nutrition
Ingredients
Allergens
About this Product
Company, Brand, & Sustainability
150
Calories
1
Sat Fat (g)
30
Sodium (mg)
40
Sugar (g)
Nutrition Facts
1 Serving Per Container
Serving Size
1 bottle
Amount Per Serving
Calories
150

XVI. Appendix B
Packaging and Recycling Attributes

1. **Packaging Material Absence Claims (Attribute 8.01) -** Use this to inform consumers that the packaging material is not made with, contains no more than trace amounts, or "free-of" certain substances. Claims must be validated and substantiated.

   Recommended SmartLabel Copy

   - This [insert package/container type] is not made with [insert substance].
   - This [insert package/container type] is free-of [substance].
   - Include consumer education materials about substance of concern.
   - Include third-party certifications when applicable.



2. **Packaging made from recycled content (Attribute 8.03)** – Use this to inform consumers that product packaging is made from recycled materials. Companies have the option to delineate post-consumer and pre-consumer recycled content and include resources to educate consumers about them. All claims must be validated and substantiated.

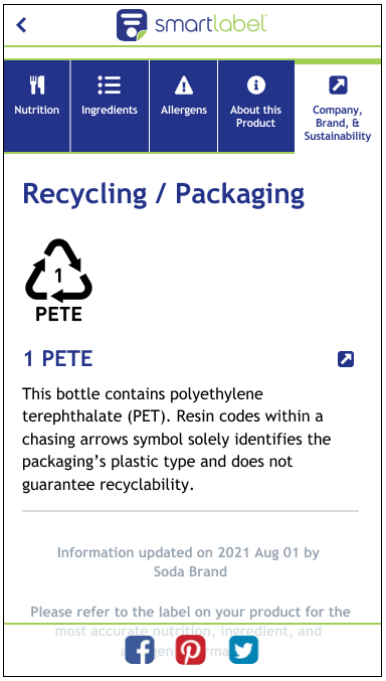
   Recommended SmartLabel copy

   - This [insert package/container type] is made from X% recycled [insert material].
   - This [insert package/container type] is made from X% [pre or post-consumer] recycled [insert materials].
   - Include consumer education resources.
   - Include third-party certifications when applicable.



FTC Green Guides: Recycled content claims (§ 260.13) are described in the guides setting forth that it is deceptive to misrepresent, directly or by implication that a product or package is made of recycled content. Recycled content includes recycled raw material, as well as used, reconditioned, and re-manufactured components. Recycled content claims may – but do not have to – distinguish between pre-consumer and post-consumer materials.

3. **Recycling Scheme (8.04) -** Use this to inform consumers of the scheme number under which the packaging material can be recycled. Also known as the "resin code".
    - Include consumer education resources on recycling schemes.
    - Clarify that resin codes within a chasing arrows symbol solely identifies the packaging's plastic type and does not guarantee recyclability.



4. **Recycling Description (8.05) -** Use this to provide information on whether product packaging is recyclable. May be combined with Recycling Scheme. Explain how to recycle different components of packaging. And/or explain why packaging material was chosen for environmental benefits.

Recommended SmartLabel Copy

- This product packaging is widely recycled in the U.S.at curbside or municipal drop-off locations. To recycle, empty container and replace cap.
- To learn more about how to recycle this [insert package/container type] in your local municipality, visit [insert resource].
- Include consumer education resources.
- Include third-party certifications when applicable.
- For those participating in How2Recycle, please include additional copy from How2Recycle if applicable:
    - **Limited Recycling:** Between 60% and 20% Americans can recycle this package at curbside recycling or drop-off recycling. Check your local program.
    - **Store Drop-Off:** Anyone who lives near a store that accepts plastic bags and wraps for recycling can take this packaging to that store and recycle it there.

- **Not Yet Recycled:** Either less than 20% of Americans can recycle this package, or it could cause a problem in a recycling facility.





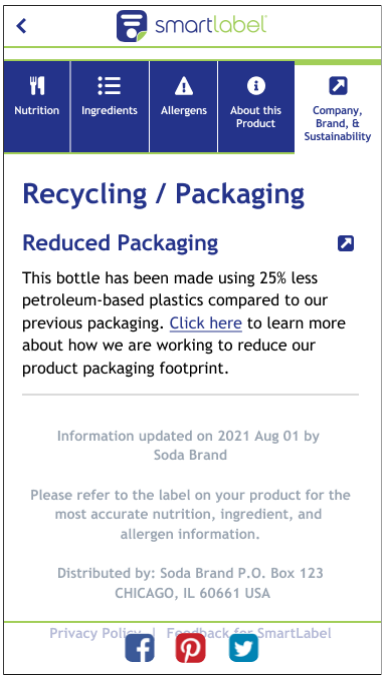


5. **Reduced Packaging Content (Attribute 8.06)** – Use this to inform consumers that packaging is made using reduced content. Claims must be validated and substantiated.

   Recommended SmartLabel Copy

   - This [package/container type] has been made using X% less [insert materials] compared to our previous packaging.
   - Provide consumer education resources.
   - Include third-party certifications when applicable.

   FTC Green Guide (source reduction claims) - Marketers should qualify a claim that a product or package is lower in weight, volume, or toxicity clearly and prominently. Example: rather than saying the product generates “10 percent less waste”, say the product generates “10 percent less waste than our previous product”



6. **Renewable Packaging Material (Attribute 8.07)** – Use this to inform consumers that packaging material is made from a renewable source, including sustainability sourced materials, plant-based and bio-based materials. Include information on why/how the material is renewable.

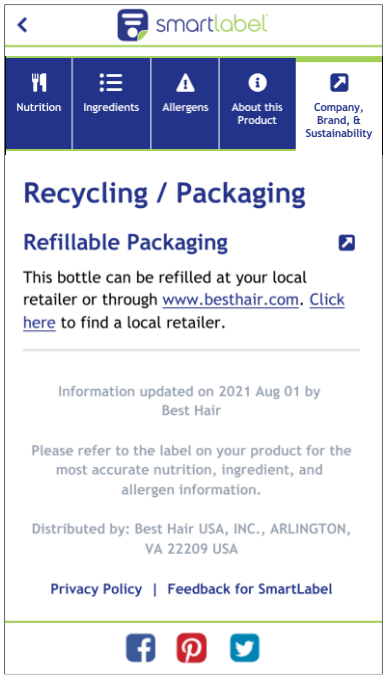


Recommended SmartLabel Copy

- This [insert package/container type] is made from X% [renewable/plant-based/bio-based/sustainably sourced materials].
- Explain HOW/WHY the material is renewable/sustainable.
- Include consumer education resources.
- Include third-party certifications when applicable.

FTC Green Guide on Renewal Materials –
Marketers should qualify renewable materials claims unless an item is made entirely with renewable materials, except for minor and incidental components. To minimize the risk of unintended implied claims, marketers can identify the material used and why the material is renewable.

7. **Refillable Packaging (Attribute 8.08)** – Use this to inform consumers that packaging can be refilled with the product that the packaging was originally intended.



Recommended SmartLabel Copy

- This [insert package/container type] can be refilled at your local retailer or through [insert brand's website].
- Include information on how to locate retailers (online or in-store).
- Include third-party certifications when applicable.

FTC Green Guide –marketer may either provide a system for the collection and refill of the package or offer for sale a product that consumers can purchase to refill the original package.

8. **Degradable (instead of biodegradable) packaging material (Attribute 8.09)** – Use this to inform consumers that packaging, when exposed to a specific set of conditions, will completely break down and return to nature within one year.



Recommended SmartLabel copy

- This [insert package/container type] will degrade when [insert condition that are not landfills, incinerators or recycling facilities] within one year after disposal.
- Provide educational resources about the process of degradation: including but not limited to biodegradable, oxo-degradable, oxobiodegradable, and photodegradable when applicable.
- Include third-party certifications when applicable.

FTC Green Guides

- Degradable claims also applies to biodegradable, oxo-degradable, oxobiodegradable, and photodegradable claims.
- Degradable claims should be qualified clearly and prominently to the extent necessary to avoid deception about 1) the product or package's ability to degrade in the environment where it is customarily disposed; and 2) the rate and extent of degradation.
- It is deceptive to make an unqualified degradable claim for items entering the solid waste stream if the items do not completely decompose within one year after customary disposal.
- Items destined for landfills, incinerators, or recycling facilities will not degrade within a year, so unqualified biodegradable claims for them should not be made.

9. **Compostable packaging material (Attribute 8.12)** - Use this to inform consumers that component(s) of product packaging may be composted and specify where the composting may safely take place, either at home or in a municipal or commercial facility. In the second case, qualify statement with availability of such facilities.

Recommended SmartLabel copy



- This [insert package/container type] may be composted at a municipal or commercial composting facility and is not designed for use in home compost piles. Appropriate facilities may not exist in your area. (*Or provide the approximate percentage of communities or consumers for which such programs are available.*)
- This [insert package/container type] may be composted at home or in the backyard.
- Provide educational resources about composting at home, in the backyard and/or at an industrial/commercial composting facility.
- Include third-party certifications when applicable.

FTC Green Guides

- Marketers who claim a product is compostable need competent and reliable scientific evidence that all materials in the product or package will break down into — or become part of — usable compost safely and in about the same time as the materials with which it is composted.

- Marketers should qualify compostable claims if the product can't be composted at home safely or in a timely way. Marketers also should qualify a claim that a product can be composted in a municipal or institutional facility if the facilities aren't available to a substantial majority of consumers.

XVII. Appendix C At-A-Glance Required Elements

Navigation, Tabs, Header and Footer		
Template	**Required Elements**	**Implementation Manual Page**
Navigation	• Navigational back arrow above the header is **required.**	31
	• Tabs must be clickable in all web browsers so the user does not have to use browser back arrow to navigate between subcategories.	31
Tabs	• All 5 tabs are **required** and **must** extend across the landing page.	28
	• Tabs **must** be separated by vertical white line breaks.	28
SmartLabel Logo	• SmartLabel logo **must** be the Registered trademark logo.	11
	• If using the neutral option for the template, the SmartLabel logo **must** be rendered in full color.	27
Type Size	• The size of the fonts **must** conform to the size in the manual.	25
	• The correct font size and style **must** conform as illustrated in the manual.	26
Header	**Header Format**	
	• Product Image **must** be clickable and enable a larger view.	33
	• Product Name & Description (statement of identity).	32
	• Product size/Net Weight statement **below** the Product Description.	32
	• UPC/GTIN **below** the product image.	32
	Regulatory Symbols and Declarations	
	• Bioengineered Ingredient disclosure (BE) – symbol or text – below the net weight statement on the left side of the header.	32
	• USDA inspection legends – meat & poultry.	32
	• Grade A declaration – milk products.	32
	• Fish wild/farmed declaration – fish products.	32
	• Juice content declaration.	32
	• Alcohol content declaration.	32
Footer	**Footer Format**	
	• Information accuracy date.	44
	• Manufactured by/Distributed by statement.	44
	• Privacy Policy link.	44
	• **Link to Feedback for SmartLabel – must link to contact form on www.smartlabel.org.**	44
Hyperlinks	• All hyperlinks throughout the SmartLabel pages that take the consumer out of SmartLabel **must** be linked to a notification that the user is leaving SmartLabel.	Throughout the Guide. See pages 24 (Modal)

Nutrition		
Tab	**Required Elements**	**Implementation Manual Page**
Nutrition	• A value is **required** for **all** Facts up Front, even if zero (0).	45
	• NFP – **exact replication** of on pack NFP – must follow FDA design requirements.	45
	• NFP **must** include added sugars and micronutrients beginning with Vitamin D, large calories value.	45
	• Products with the simplified NFP format **must duplicate** on-pack footnote statement: "Not a significant source of …"	46
	• New language for products that are exempt from nutrition labeling	47
	• **See VI. Infant Formula for required infant formula nutrition panel**	67

Ingredients		
Tab	**Required Elements**	**Implementation Manual Page**
Ingredients	• Ingredients **must** be displayed in a stacked list in order of predominance.	49
	• All multi-component ingredients **must** be clearly indented.	50
	• All descriptors, including definitions, **must** be accessible via a drill-down designated by an arrow in the stacked list format.	50
	• CBD Ingredients must include ingredient definitions	51

Allergens		
Tab	**Required Elements**	**Implementation Manual Page**
	• Required fixed copy reads: "According to the FDA, the most common food allergens are milk, peanuts, eggs, fish, crustacean shellfish, soy, tree nuts, wheat and **sesame**. The statement • **must** be displayed at the top of the page on a **blue background.**	51
	• Allergens **must** be listed in a stacked format and be identified by Contains, May Contain, Shared Facility/Equipment in blue ovals.	51
	• Descriptors, definitions, etc. **must** be accessible via a drill-down designated by an arrow on the right side of the listed allergen.	51
	• For products that contain fish, shellfish, or tree nuts, the species of fish and crustacean shellfish, as well as the type of tree nut, **must** be displayed in a linked page.	52
	• If the product does not contain any of the common allergens, this statement is **required**: "This product does not contain any of these common food allergens."	53
	• **"Allergen Free"** claims and claims such as gluten free, lactose free **must** be placed under **Features & Benefits** on **the About this Product** tab.	54

About this Product		
Tab	**Required and Voluntary Elements**	**Implementation Manual Page**
Features & Benefits	• **Required** statement at the top of the page **must** read: "Claims listed within SmartLabel are either governed by entities such as the USDA, FDA, EPA, etc., or defined by participating brands" and be **displayed on a blue background.**	55
	• Nutrient content claims, absence claims, no added ingredient claims, compositional claims, or organic statements – **voluntary.**	55
	• Country of Origin Statement **- must** duplicate on-pack country of origin statement.	55
	• If claims are displayed, they **must** be in alphabetical order – **required**.	55
	• BE explanation linked to header BE symbol or text – **voluntary.**	55
Certifications	• **Required** statement at the top of the page **must** read: "SmartLabel includes certifications from independent organizations that have meaningful and consistent standards for product composition, environmental protection and/or social responsibility" and be **displayed on a blue background.**	56
	• **Best Practice -** certification symbol and description of the certification with a link to the certifying body website.	39
Health & Safety	• Warning statements required by regulation on the packaging – **required.**	57
	• Warning statements not required by regulation (i.e. choking hazard) – **required.**	57
	• Safe handling statements **required if on the packaging.**	57
	• **Requirements for CBD products.**	58
	• **Requirements for FDA regulated alcoholic beverages.**	58
	• **See Section VII. for requirements for displaying baby food testing in SmartLabel**	74
Product Instructions	• Preparation instructions **- voluntary except for infant formula** (See Section VI. Infant Formula for additional requirements).	58
	• Storage Instructions **- voluntary but recommended.**	58
	• Recipes **- voluntary but recommended.**	58

Company, Brand & Sustainability		
Tab	**Required & Voluntary Elements**	**Implementation Manual Page**
Contact	• **Contact Us** and **Call Us** are **required** for all brands that provide both for customer service. At a minimum, the Contact Us link **must** trigger an email to your customer support team or link to a Contact Us form on your company/brand website.	59
	• **Hyperlinks** to company/brand websites are **voluntary but recommended.**	60
	• Sustainability claims and attributes and links to corporate sustainability practices are **voluntary but recommended**.	60

smartlabel
By Consumer Brands Association

Consumers want information.

SmartLabel delivers.

For questions or concerns, please reach out to:

Rishi Banerjee - rbanerjee@consumerbrandsassociation.org
Nancy Moskowitz - nmoskowitz@consumerbrandsassociation.org