

SmartLabel Retailer Implementation Committee Meeting November 12, 2025

The Q4 2025 SmartLabel Food and Beverage Implementation Committee Meeting focused on updates and discussions regarding consumer transparency initiatives and state-specific labeling requirements. Recent activities and upcoming events were highlighted, including participation in industry summits and the launch of National Consumer Transparency Week, which will highlight SmartLabel and Facts up Front. The meeting also covered comparisons between SmartLabel and Yuka, proposed regulations for bioengineering food disclosure, and geographic-specific functionality for digital disclosure features, e.g., Louisiana SB 14.

CPG Summit Summary and SmartLabel Events

Rishi Banerjee, SmartLabel Senior Director, provided updates on recent activities and events, highlighting the CPG Summit in Carlsbad, California, which focused on consumer transparency and SmartLabel's role in addressing state patchwork legislation. He also discussed his participation in Startup CPG, a community of 30,000 members primarily consisting of small micro-brands, to explore opportunities for SmartLabel in engaging with consumers cost-effectively. Rishi emphasized the growing importance of consumer transparency and SmartLabel's position as a key component in addressing these challenges.

Rishi attended the Sustainable Packaging Innovation Forum in Chicago and participated on a panel with The Kraft Heinz Company and The Recycling Partnership that discussed how brands and industry organizations are collaborating for smarter labels

Rishi will be heading to Chicago to attend the **Private Label Manufacturers Association** event, where SmartLabel's growth and transition to 2D barcodes will be highlighted.

Consumer Brands Association – National Consumer Transparency Week

Rishi announced a new Consumer Brands initiative – Consumer Transparency Week – which is slated to launch the first week of December. The campaign is in response to increasing consumer transparency demands and pressure at the federal and state level for ingredient transparency. National Consumer Transparency week will build a positive narrative with the administration, policy makers, media, and the public. SmartLabel and Facts Up Front, two industry-led transparency solutions, will be elevated during the campaign.

The SmartLabel team will disseminate a toolkit and talking points for National Consumer Transparency Week.

Yuka vs. SmartLabel Transparency Comparison

Nancy Moskowitz, SmartLabel Manager, reviewed the results of a survey of 100 food products and 25 personal care products that compared attributes in SmartLabel with the same attributes in Yuka, a digital tool that labels products as Poor, Bad, Good and Excellent, claims to have 84 million app users (includes European users), 4 million food products and 2 million personal care products in its database.

Not all of the products in SmartLabel were found in Yuka, including products from well-known brands like Conagra, Dole, Topco Associations and others. The comparison found that 29% of

the compared food and beverage attributes and 49% of the personal care products in Yuka did not align with the attributes in SmartLabel, leading the reviewer to conclude that Yuka does not update product information when there are new formulations.

Yuka does not provide all the ingredients in food products, nor does it provide allergen and certification information, claims, health and safety or sustainability information, all of which are provided in SmartLabel.

BE Standard Update

Rishi discussed the proposed AMS rule to amend the National Bioengineered Food Disclosure Standard to remove the standalone text message disclosure option found at 7 CFR 66.108 and to add language to the electronic or digital disclosure option found at 7 CFR 66.106, requiring an accompanying BE symbol or on-package text as defined in sections 66.104 and 66.102 when an electronic or digital link disclosure is made. The proposed rule is expected to be published in December 2025 with the Final Rule planned for April 2026. The Spring 2025 Unified Agenda (which provides estimated timelines for rulemaking) entry for this rule has the proposed rule releasing in December of 2025 and the final rule issuing in April of 2026

Louisiana SB 14 – Ingredient Disclosure

Mr. Banerjee raised the potential implementation of Louisiana SB 14 in SmartLabel. The regulation requires a digital trigger (QR code) on pack that leads to the online disclosure of food containing artificial colors, additives or banned chemicals in the product. The disclosure must be “in a prominent” location and contain the following information: **NOTICE:** This product contains [insert ingredient here]. For more information about this ingredient, including FDA approvals, click [HERE](#). The disclaimer links to the FDA web page on food chemical safety.

Mr. Banerjee proposed the idea of disclosing the required information in a banner at the top of the SmartLabel page that can expand to disclose multiple ingredients.

Wishing you a safe and happy holiday season. See you next year!