



Frequently Asked Questions

What is a “label review”?

What appears on a product label is not “free speech” and is governed by regulations at the federal and/or state level. *knowledge bank’s* label reviews are a "health checkup for your USA label artwork". We evaluate your English-language text and artistic designs for compliance to USA rules set by the FDA, USDA, and FTC in a report with recommendations. We also provide passages or excerpts of the government regulations and guidance (on request) so you know the basis of our regulatory advice.

The *label* is everything that is adhered/printed on the package or container while *labeling* is the other material associated with your product. Regulatory agencies treat labels and labeling equal when it comes to compliance. All those exciting brand promo materials (such as, hang-tags, sell sheets, marketing demos, and website copy) have the same regulatory requirements as the physical label.

knowledge bank regulatory check-ups advise what is compliant, correct, and credible.

“Required elements”	EX: Statement/ standard of identity, net quantity, ingredient declaration, allergen statement, business information, font sizes, rounding rules, product specific warnings, establishment numbers
Voluntary content & claims	EX: Structure/function claims, healthy claims, marketing copy, suitable imagery to product identity, cooking directions, dietary & lifestyle guidance

Does *knowledge bank* suggest how to fix the label?

Yes, *knowledge bank* label reviews suggest "how to fix" the text or graphics to be compliant with the regulations: we don't just tell you “It’s Wrong”. Our reports provide the information needed to make an informed business decision with our interpretation of priorities. Ultimately, it's your choice as the brand owner of the label and labeling. However, we are not a graphic design company and not a law firm. We'll recommend other firms for the artistic edits or legal interpretations of the regulations.

What products does *knowledge bank* cover?

We focus on edible, retail products destined for U.S. commerce in-store and on-line. It will be shorter to state what we do NOT cover: drugs, infant formula, pet foods, cosmetics, alcohol, tobacco, or cannabis products.

Can you provide a Nutrition Facts or Supplement Facts (NFL or SFL)?

knowledge bank offers several services for a product’s nutrient information display. The “white boxes” of nutrient names and values were often called the NFP (because FDA used to call that the Nutrition Facts panel). The evaluation or creation of the NFL and SFL is a separate service and expertise from creation of the ingredient and allergen statements. Ask about our discounts for combined projects.

When *knowledge bank* creates the NFL or SFL, we start with your technical documents from suppliers, formulators, chefs, or laboratory analyses. This confidential data is used to create a “theoretical” nutrition panel that is compliant for FDA and USDA regulations. We advise how to evaluate and adjust your NFL and SFL to support label claims and total available space. We do not chemically analyze or “test” your products. Please do not ship us samples; we can recommend third-party laboratories who provide testing services. This “white boxed” information is not always required if you are not making label claims and you qualify as a “small business”.





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Frequently Asked Questions (*continued*)

What do I name an ingredient, or can I leave off additives I don't like?

knowledge bank assists product developers, marketers, and entrepreneurs with naming ingredients and IF an additive/substance may be omitted from the final ingredient declaration. We can educate you about the proposed ingredient declaration and the implications of natural flavor naming. Whenever possible, we'll make recommendations to reduce the word count or present more consumer-friendly terms.

Our frank, confidential conversations with your team require formulation details and ingredient specifications. We don't rely on an email saying "of course, it's GRAS". Labeling of the 9 major USA allergens is provided with *knowledge bank* ingredient review services. For a separate fee, we provide guidance on National Bioengineered Food Disclosure Standard (NBFDSD) regulations that apply even to FDA regulated products.



Who are *knowledge bank* customers?

knowledge bank does not disclose our client list. We provide confidential services to private label owners like start-ups and entrepreneurs, contract manufacturers, grocery retailers, importers, and law firms. Our clients include start-ups who operate from kitchen tables to very large (\$1B+) and multi-national organizations. Rest assured with over 5,000 product labels reviewed since 2002, our clients' brands are well represented throughout the grocery aisles and e-commerce.



Why *knowledge bank*, I already have a regulatory department?

From time-to-time, staff may have too many duties and too little time to stay up-to-date. *knowledge bank* supports and supplements your team as you may require. This may include mentoring your in-house regulatory team or advising the product developers when innovating healthier nutrient targets for new niches. *knowledge bank* focuses solely on USA labeling regulations.

Do I need a lawyer?

knowledge bank is a regulatory consultancy. We are not lawyers and do not provide legal advice. If you already have legal counsel, we can funnel communications through counsel to allow you to maintain client-attorney privilege.

We have many labels and products; do you offer discounts?

knowledge bank will work with you to provide the appropriate level of services. Where products are similar, we often suggest creating a single "hero" or top-line report. Then, your team can learn and manage label editing across the other products internally with less consultation time. Discounts for second artwork reviews (after the initial reports are prepared) may be available if requested within a specified time due to yearly regulatory changes.

More questions?

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