

# MSU Product Center: Nutrition Facts Label Services - Fee Schedule

## General Information

The pricing information outlined in this document is applicable to Michigan-based businesses only. You must be a Product Center client to receive Nutrition Facts label services. Please contact your Innovation Counselor with any questions you may have regarding this document or the fees related to this service. The general format of a MSU Product Center invoice for Nutrition Facts label services is as follows:

Nutrition Facts Label - Price of Label \* number of labels at that price = X  
Pre/Post Label Review - \$121.00 hourly rate \* (Pre Label Hours + Post Label Hours) = Y  
Additional Fees - Price of Additional Fee \* number of additions at that price = Z  
Total = X + Y + Z

## Price of Label

The table below lists the price of various types of Nutrition Facts label formats offered by the Product Center. Please reach out to your Innovation Counselor if you would like pricing information for a format that is not included in the table. The term “single” refers to one label of a specific format. A label will qualify as “similar” if it has 3 or less ingredient variations compared to a “single” label that was obtained from the MSU Product Center in the past 6 months.

Example: You obtain a standard format Nutrition Facts label for Product A (ingredients: fresh tomato, sugar, salt, water) from MSU on 1/1/24. If you request a standard label for Product B (canned tomato, sugar, salt, garlic) on 6/30/24, it would be charged as a “similar” label. This is because the format is the same, the request was made within 6 months of obtaining A’s label, and there are only 3 ingredient variations between A and B. The 3 ingredient variations are substituting canned tomato for fresh, removing water, and adding garlic.

Type of Label	Single Price	Similar Price
Standard (vertical)	\$100.00	\$75.00
Tabular (horizontal)	\$100.00	\$75.00
Simplified	\$100.00	\$75.00
Linear (string)	\$125.00	\$100.00
Dual-column	\$150.00	\$125.00



## Pre Label Hours

Any time spent working on the label prior to generating it in the Nutrition Facts software is considered pre label review hours. Examples of pre label hours are listed below.

**1. Reviewing your PAR Form.** When your Innovation Counselor submits a Nutrition Facts service request for your recipe, they include your product's PAR form. The request and PAR form are sent to the Product Center's Food Safety and Nutrition Technician (FSNT), a staff member who specializes in generating Nutrition Facts labels. The FSNT will review your PAR form and you will be notified of any errors they find. These errors need to be corrected in order to continue with the service. Therefore, this time spent reviewing your PAR form and contacting you regarding errors is considered pre label hours.

- Note: You will only be billed for time that the FSNT spends reviewing your PAR form. The time you spend working on/ reviewing your PAR form with your Innovation Counselor is not considered billable pre label hours.

**2. Calculations and Determinations.** For every label, the FSNT needs to calculate and determine values such as serving size, servings per container, moisture loss, label statements, etc.

**3. Finding Ingredient Nutritional Information.** In order to generate a label for your product all of the ingredients used in the recipe must exist in the FSNT's Nutrition Facts software database. The time the FSNT spends checking their database and resources for nutritional information for each ingredient used in your recipe is considered pre label review hours.

- Note: Ingredients that do not exist/ cannot be found in the FSNT's database and resources prior to generating the label for your product are considered specialty ingredients. If your recipe contains a specialty ingredient, the FSNT will request nutritional information from you and add the ingredient to their database using the information you provided. If the FSNT requests specialty ingredient information, you can provide them with either of the two options listed below.
  1. An image of the ingredient's Nutrition Facts label, as long as it is compliant with current FDA label requirements (e.g. the 2016 format changes, etc).
  2. A product nutritional specification sheet obtained from the ingredient's manufacturer.
- Please let your Innovation Counselor know if you would like the FSNT to obtain the nutritional information for any specialty ingredients used in your recipe. Any time the FSNT spends obtaining specialty ingredient information for your product will be billed at the standard \$121 hourly rate under pre/post label review hours.

## Post Label Hours

Post label review hours account for the time the FSNT spends generating your label in their Nutrition Facts software. This includes the time it takes to manually input any specialty ingredients used in your recipe to the Nutrition Facts software database.

## Price of Additional Fees

See the table below for the name, description, and price of additional fees that could be included in your Nutrition Facts service invoice.

Fee Name	Description	Price
Specialty Ingredients	Adding an ingredient used in your recipe to the Nutrition Facts software database in order to generate your label.	\$25.00 per ingredient
Container Size Change	Change in container size or additional container size requested for an existing recipe with a completed label.	\$30.00 per label
Format Change	Changing the format of a completed label for an existing recipe.	50% of new label format price
Voluntary Nutrients	Additional nutrients (not the standard 14 required by the FDA) are added to the label.	\$10.00 per nutrient

## Example Nutrition Facts Invoice

You previously obtained a standard format label for a 10 ounce container of Product A (apples, oranges, water, sugar) from MSU. Within 6 months of receiving that label you request the following labels:

- Product A (same recipe) but in a 5 ounce container, standard
- Product B (apples, oranges, water, specialty ingredient), standard
- Product C (carrots, onion, tomato), dual-column

For the sake of simplicity, we will say that the FSNT billed 1 total pre/post label review hour for all 3 labels together. Your invoice for these 3 labels would be as follows:

Nutrition Facts Label -  $(\$75 * 1 \text{ for B}) + (\$150 * 1 \text{ for C}) = \$225.00$

Pre/Post Label Review -  $\$121.00 * 1 = \$121.00$

Specialty Ingredients -  $\$25.00 * 1 \text{ for B} = \$25.00$

Container Size Change -  $\$30.00 * 1 \text{ for new A} = \$30.00$

Total = \$401.00

## Frequently Asked Questions

### **1. Can I use a simplified format for my product's label?**

A simplified Nutrition Facts label may be used if at least eight of the following nutrients are present in insignificant amounts: Calories, total fat, saturated fat, trans fat, cholesterol, sodium, total carbohydrate, dietary fiber, sugars, protein, vitamin A, vitamin C, calcium and iron (FDA Food Labeling Guide, page 43).

In order to determine if a simplified format can be used, the FSNT will first have to generate a standard label for the product. They will then use the standard label to determine if the product meets the requirements for simplified format use.

If you would like to use a simplified format (if possible), please disclose this to your Innovation Counselor before services begin. That way they can inform the FSNT of this desire when they submit the Nutrition Facts service request for your product.

### **2. What are the special labeling provisions for small and intermediate sized packages?**

Food packages with a surface area of 40 sq. in. or less available for labeling may place the Nutrition Facts label on any label panel (not limited to the information panel) and may also use the tabular display label format (FDA Food Labeling Guide, page 65).

A linear (string) format may be used on food packages with 40 sq. in. or less total surface area available for labeling if the package shape or size cannot accommodate the nutrition information placed in columns on any label panel (FDA Food Labeling Guide, page 65).

Any requested total surface area calculations/ package size determinations performed by the FSNT will be billed under pre/post label review hours at the standard \$121 hourly rate.

### **3. Is an ingredient and/or allergen statement included with my Nutrition Facts label?**

No, the client is responsible for generating an accurate allergen statement for their product. Additionally, the client is responsible for generating an accurate ingredient statement (and sub listing ingredients as necessary) for their product.

### **4. When can I expect to receive my label after the service request is submitted?**

The time frame of a Nutrition Facts service request varies depending on factors such as the amount of labels requested, length/ complexity of recipes, quality of PAR forms submitted, etc. Submitting a standardized recipe on a well filled out and reviewed PAR form, and responding to any questions the FSNT has in a timely manner are good ways to shorten your expected wait time.

### **5. Do I need to submit a sample of my product to receive my label?**

No, the MSU Product Center uses database analysis to generate Nutrition Facts labels. We do not request/ require product samples as no laboratory testing is involved in this method.