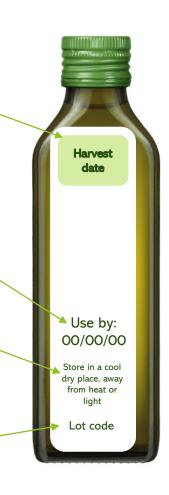


OOCC Required Labeling Rules

- If harvest date is mentioned, 100% of olives used to make oil have to come from that year
- Use by date is mandatory and must be supported by technical evidence, displayed as either "Best if Used by" or "Use by". Technical Evidence Guide.
- Storage conditions must be included to ensure validity of that date
 - Lot identification must be permanently marked to identify producing factory and lot



If reference to an estate is made 95% of the oil must have been grown on that estate

Varietal name

Extra Virgin

Olive Oil

Estate

First Cold Press

100% California

California is on the PDP and 100% of the oil is not California origin, the % of California origin oil must be listed in a font no less than the largest font used to print California on the PDP

If olive varietal names are on label, 85% of the oil must come from that varietal by weight

Specific grade of oil must be called out in a prominent and legible way on the principal display panel

If label states "California Olive Oil" or something similar, 100% of that oil shall derive from olives grown in California. If referenced to a specific region in California, then 85% of that oil shall derive from olives grown in that region. If referenced to a specific estate in California, then 100% of that oil shall derive from that estate and must be owned or controlled by that producer

Prohibited terminology – pure, pure olive oil, lite, lite olive oil, light, light olive oil, extra light, extra light olive oil, extra lite, extra lite olive oil, super virgin

OOCC Optional Labeling Rules

- First cold press", "Cold pressing", "Cold extraction" or "Cold Crushed" can only be used for extra virgin olive oil or virgin olive oil
- Lot code and use by date can be on the front or back label
- Harvest date is optional, but if included, 100% of the olives in the oil must be from the year listed
- ► CA Grown label is optional for OOCC members



OOCC label is optional to use if member is in good standing



California Health and Safety Code

If the product is clearly labeled as a blended vegetable oil, the % of each oil is required to be predominantly displayed.

FDA Required Labeling Rules

Nutritional labeling and ingredient statement must be present

Full address of the firm name and address if this information is not listed in a current city directory or telephone book



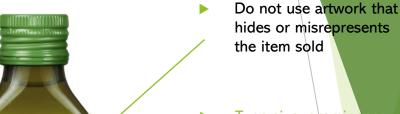
Name and address of the manufacturer, packer or distributor, must be accompanied by the firm's relation to the product, "manufactured for", "distributed for"

Country of origin statement needs to be close to the name and address and be comparable in size lettering

Extra Virgin

Olive Oil

500mL (16.9fl oz)



Type size, prominence and conspicuousness requirements

Statement of identity must appear on the font label or PDP and must be in large, prominent text

Net quantity statement must appear on the PDP lower 30% with no intervenient material

- Net Content wording is required if >1/bs volume
- Must be metric and US units

Information that is not required by the FDA cannot be placed in between the required labeling on the information panel

Note:

PDP = Primary Display Panel (Front label)

SOI = Statement of Identity

FDA Specific Nutrition Facts Labeling

Nutrition I	Facts
33 servings per contain Serving size 1 to	ner b <mark>sp (15mL)</mark>
Amount per serving Calories	130
	% Daily Value*
Total Fat 14g	18%
Saturated Fat 2g	10%
Trans Fat 0g	
Polyunsaturated Fat 1.5g	
Monounsaturated Fat 11g	
Sodium 0mg	0%
Total Carbohydrate 0g	0%
Protein 0g	
Not a significant source of che dietary fiber, total sugars, add vitamin D, calcium, iron and p	ed sugars,
*The % Daily Value tells you how muc serving of food contributes to a daily d	

- Required Nutrients to Show: Calories, Total Fat, Saturated Fat, Trans Fat, Cholesterol, Sodium, Total Carbohydrate, Dietary Fiber, Total Sugars, Added Sugars, Protein, Vitamin D, Calcium, Iron, Potassium.
 - ▶ The bolded nutrients must appear in bold on label.
 - Voluntary nutrients Polyunsaturated Fat, Monounsaturated Fat, Soluble and Insoluble Fiber, Sugar, Alcohol.
- Insignificant clause can be used if 8 or more nutrients are zero.
- Condensed daily value claim is permitted with using the insignificant clause
- Detailed specifics for font size, type, border size, type, authorized word abbreviations: <u>Type size, prominence and conspicuousness</u>
- Determining the values- using software like genesis, testing 20 sample and averaging, or <u>USDA database</u>

FDA Specific Nutrition Facts Labeling Continued

Example of Graphic Enhancements used by FDA



Nutrition Facts Panel Options for EVOO

The labels presented below offer accurate and reliable information regarding the nutrition facts panel for EVOO. It is important to note that each company has the freedom to independently select the most suitable label for their product.

Nutrition	
XX servings per conta Serving size 1	ainer tbsp (15mL)
Amount per serving Calories	130
	% Daily Value*
Total Fat 14g	18%
Saturated Fat 2g	10%
Trans Fat 0g	
Polyunsaturated Fat 1.5	g
Monounsaturated Fat 11	g
Cholesterol 0mg	0%
Sodium 0mg	0%
Total Carbohydrate 0g	0%
Dietary Fiber 0g	0%
Total Sugars 0g	
Includes 0g Added Su	gars 0%
Protein 0g	
Vitamin D 0mcg	0%
Calcium 0mg	0%
Iron 0mg	0%
Potassium 0mg	0%
*The % Daily Value tells you how m serving of food contributes to a daily day is used for general nutrition adv	diet. 2,000 calories a

^{*}Contents updated per FDA guidelines for rounding as of 2016

Nutrition	า Facts
XX servings per co Serving size	ntainer 1 tbsp (15mL)
Amount per serving Calories	120
	% Daily Value*
Total Fat 14g	18%
Saturated Fat 2g	10%
Trans Fat 0g	
Polyunsaturated Fat	1.5g
Monounsaturated Fa	t 10g
Cholesterol 0mg	0%
Sodium 0mg	0%
Total Carbohydrate 0g	0%
Dietary Fiber 0g	0%
Total Sugars 0g	
Includes 0g Added	Sugars 0%
Protein 0g	
Vitamin D 0mcg	0%
Calcium 0mg	0%
Iron 0mg	0%
Potassium 0mg	0%

day is used for general nutrition advice.

FDA Optional Labeling Rules

- An ingredient statement is only mandatory if there is more than one ingredient in the product
 - For extra virgin olive oil, if this is the only ingredient, an ingredient statement is not needed
 - If the product is flavored, co-milled with fruit, or blended with other types of oils labeling ingredient statement is required
- ► Heart health claim is an option- requiring a specific refer to FDA guidelines
 - "Supportive but not conclusive scientific evidence suggests that daily consumption of about 1½ tablespoons (20 grams) of oils containing high levels of oleic acid, when replaced for fats and oils higher in saturated fat, may reduce the risk of coronary heart disease. To achieve this possible benefit, oleic acid-containing oils should not increase the total number of calories you eat in a day. One serving of [x] oil provides [x] grams of oleic acid (which is [x] grams of monounsaturated fatty acid)."
 - "Supportive but not conclusive scientific evidence suggests that daily consumption of about 1½ tablespoons (20 grams) of oils containing high levels of oleic acid, may reduce the risk of coronary heart disease. To achieve this possible benefit, oleic acid-containing oils should replace fats and oils higher in saturated fat and not increase the total number of calories you eat in a day. One serving of [x] oil provides [x] grams of oleic acid (which is [x] grams of monounsaturated fatty acid)."
- Prohibited Use
 - ► Term Fresh
 - ► Term Natural
 - Reference to product being healthy or claims about health benefits it has (other than heart health above)

FDA Small Business Exceptions

- Nutritional labeling may not need to be included on the label
- Small businesses with less than 10FTE's and less than 10,000 units do not have to file with the FDA, however, these businesses can in order to establish their exemption
- ▶ A firm whose total gross sales for all products, food and non-food, is \$501,000, with only \$49,000 of this figure representing sales of food, is also exempt. Under the NLEA, firms who have an annual gross sales made, or business done in sales to consumers that is not more than \$500,000 or have annual gross sales made or business done in sales of food to consumers of not more than \$50,000 are exempt
- Total business revenue even if not from olive oil sales, is included in the total revenue. If olive oil sales are under the threshold, the other products sold might push the distributor over the threshold

References

- ► OOCC Specific requirements
- California Department of Public Health
- ► FDA Guidance
- ► FDA Guidance Reference