

Understanding Modern Labeling Laws: A Critical Guide for Brands, Manufacturers, and Packaging Teams

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Labeling laws have evolved dramatically over the last decade, driven by heightened regulatory scrutiny, global supply-chain transparency, consumer protection priorities, and the explosive growth of e-commerce. For brands, packaging suppliers, and manufacturers, the label is no longer just a design element—it is a legal document. Getting it wrong can trigger costly recalls, fines, class-action lawsuits, or retailer delistings.

As someone who has spent more than 30 years advising brands from Fortune 500 CPGs to DTC startups, I've seen firsthand how a missing claim, misused icon, or incorrect net-weight declaration can derail a launch. Today, compliance is a strategic advantage, and every company must understand the landscape.

1. Federal Labeling Requirements: The Core Framework

Most products sold in the United States fall under one of three major federal regulatory bodies—each carrying its own mandatory labeling requirements.

FDA (Food and Drug Administration)

Covers food, beverages, dietary supplements, cosmetics, OTC drugs, and medical devices. Requirements include:

- Statement of identity
- Net quantity (by weight, measure, or count)
- Ingredient declarations in descending order
- Allergen statements (per FALCPA)
- Nutrition Facts panels (for applicable categories)
- Truthful, substantiated claims
- Proper font size, placement, and panel formatting

Recent areas of enforcement include “natural” claims, added-sugar disclosures, CBD content, and misleading front-of-pack imagery.

FTC (Federal Trade Commission)

Focuses broadly on truth-in-advertising.

- All claims—environmental, performance-based, comparative—must be **truthful, non-deceptive, and substantiated**.
- Greenwashing is a top enforcement priority.
- The new “Green Guides” revisions (expected soon) will raise scrutiny on sustainability claims like “recyclable,” “biodegradable,” and “compostable.”

USDA (United States Department of Agriculture)

Covers meat, poultry, and certain agricultural products.

- Claims such as **organic**, **grass-fed**, and **no antibiotics** must meet strict certification standards.
- Country of Origin Labeling (COOL) applies to several product types.
- FSIS approvals may be required for certain label configurations.

2. State-Level Rules: Where Many Companies Get Caught

Federal law sets the foundation—but states add their own requirements.

California Prop 65

One of the most stringent and often misunderstood laws.

- Requires warning labels for exposure to chemicals “known to the State of California to cause cancer, birth defects, or reproductive harm.”
- Applies to packaging materials (inks, adhesives, plastics) as well as product content.
- Non-compliance can lead to private lawsuits—aggressively filed.

California’s New Recycling & Packaging Laws

SB 343 and SB 54 dramatically change recyclability claims:

- “Recyclable” claims must be backed by availability in statewide recycling programs.
- Chasing-arrows icons will be heavily restricted.
- Brands must support Extended Producer Responsibility requirements over the coming years.

Other State Requirements

- **Vermont & New York:** strict fragrance allergen disclosure (cosmetics).
- **Hawaii:** plastic labeling and environmental claims.
- **Washington & Oregon:** PFAS bans in certain packaging.
- **Many states:** unique bottle-bill or deposit labeling.

3. Global Labeling Laws for Brands Selling Internationally

For companies with cross-border distribution, compliance becomes even more complex.

EU Labeling (including the Green Deal & Packaging Act reforms)

- Mandatory environmental symbols and recycling instructions
- Strict nutrient labeling formats
- Banned claims such as “natural water” or unverified eco-claims
- Upcoming “Digital Product Passport” requirements

Canada

- Bilingual labeling (English & French)
- Specific format rules for Nutrition Facts
- Strict organic certification rules

Asia-Pacific

- China, Japan, India, and Australia each require unique labeling standards, allergen lists, lot coding, and import-approval processes.

4. Sustainability Claims: The Fastest-Growing Risk Category

Sustainability messaging has become a marketing necessity—but regulators are aggressively cracking down.

Top risk areas include:

- “Recyclable” or “100% recyclable” claims
- “Compostable” vs “compostable in industrial facilities only”
- “Plastic-neutral” or “carbon-neutral” claims (require independent verification)
- Use of green imagery (leaves, Earth symbols, green coloration) that implies environmental benefits

The FTC is expected to release a major overhaul of the **Green Guides**, which will significantly tighten allowed claims.

5. Retailer-Specific Labeling Requirements

Big box retailers are now acting as regulators themselves.

Examples:

- Walmart recyclable packaging guidelines
- Amazon's APASS / ISTA requirements
- Costco multilingual & regulatory compliance checklists
- Target's sustainability scorecard

Failure to meet retailer labeling standards often results in fines, chargebacks, or removal from shelves.

6. Why Brands Are Turning to Packaging Consultants

With such a complex regulatory environment, companies are increasingly seeking expert guidance. A seasoned packaging consultant can help with:

✓ Label Review & Compliance Audits

Evaluation of all packaging panels—primary, secondary, shipping, and e-commerce.

✓ Pre-Market Regulatory Checks

Ensuring FDA/FTC/USDA compliance **before** production.

✓ Sustainability Claim Verification

Assessing whether recyclability, compostability, or carbon-related claims can be legally supported.

✓ Packaging Material Analysis for Prop 65 & PFAS

Review of inks, coatings, adhesives, molded fiber, plastics, and laminations.

✓ International Market Readiness

Adapting packaging for Canada, EU, Asia, or global retail channels.

✓ Risk Assessment for Rebranding or Packaging Refreshes

Avoiding the legal pitfalls that often arise during design changes.

Conclusion: In Labeling, Precision Is Profit

Labeling is no longer a simple design task—it's a legal strategy. The companies winning today are those that treat packaging compliance as an integrated discipline: regulatory science, consumer messaging, sustainability, and brand protection all under one umbrella.

For brands in food, beverage, health, beauty, household goods, e-commerce, or specialty categories, the stakes have never been higher. The right label protects your brand—legally, financially, and reputationally.