LABELING OF VINEGAR

The following will provide guidance on how to label vinegar.

Labeling of Vinegar in the Ingredient Statement

Manufacturers are required to indicate the common or usual name of each type of vinegar used as an ingredient. The Food and Drug Administration has provided a Compliance Policy Guide (CPG) on the labeling of vinegars, which can be accessed HERE. If a blend of several types of vinegars is used, all types used should be listed with the product names appearing in order of predominance. The Food and Drug Administration also has stated that diluted glacial acetic acid is not vinegar. (Compliance Policy Guide 562.100, which can be found HERE.)

Dilution Statement

The CPG on the labeling of vinegar also provides guidance from the Food and Drug Administration on the inclusion of a dilution statement. See below for more details.

Natural vinegars as they come from the generators normally contain in excess of 4 grams of acetic acid per 100 mL. When vinegar is diluted with water, the label must bear a statement such as "diluted with water to _____ percent acid strength", with the blank filled with the actual percent of acetic acid - in no case should it be less than 4 percent. Each of the varieties of vinegar listed below should contain 4 grams of acetic acid per 100 mL.(20oC).

Nutrition Labeling

Most vinegars contain insignificant amounts of some or all of the mandatory nutrients required in nutrition labeling. Nutrition analysis of your specific vinegar products will provide the information necessary to correctly label your products. Information from the United States Department of Agriculture's National Nutrient Database for Standard Reference includes generic information for apple cider, balsamic vinegar, distilled vinegar red wine vinegar. These are included for your reference. Specific brands are also included in this database, which can be accessed HERE.

Nutrition labeling is not required if your product meets the requirements for "insignificant amounts' of ALL of the following components: calories, total fat, saturated fat, *trans* fat, cholesterol, sodium, total carbohydrate, dietary fiber, total sugars, added sugars, protein, vitamin D, calcium, iron and potassium, as outlined in 21 CFR 101.9(j)(4).

(j) The following foods are exempt from this section or are subject to special labeling requirements:

(4) Foods that contain insignificant amounts of all of the nutrients and food components required to be included in the declaration of nutrition information under paragraph (c) of this section, Provided, That the food bears no nutrition claims or other nutrition information in any context on the label or in labeling or advertising. Claims or other nutrition information subject the food to the provisions of this section. An insignificant amount of a nutrient or food component shall be that amount that allows a declaration of zero in nutrition labeling, except that for total carbohydrate, dietary fiber, and protein, it shall be an amount that allows a declaration of "less than 1 gram." Examples of foods that are exempt under this paragraph include coffee beans (whole or ground), tea leaves, plain unsweetened instant coffee and tea, condiment-type dehydrated vegetables, flavor extracts, and food colors.

*Note: There are other provisions in 21 CFR 101.9(j), only (4) has been included above. The inclusion of nutrition claims or other nutrition information on the label or advertising subjects the product to full nutrition labeling.

If a product contains “insignificant amounts” of EIGHT or more of the nutrients listed above, nutrition information may be presented in simplified format.

(*f) The declaration of nutrition information may be presented in the simplified format set forth herein when a food product contains insignificant amounts of eight or more of the following: Calories, total fat, saturated fat, trans fat, cholesterol, sodium, total carbohydrate, dietary fiber, total sugars, added sugars, protein, vitamin D, calcium, iron, and potassium; except that for foods intended for infants through 12 months of age and children 1 through 3 years of age to which paragraph (j)(5)(i) of this section applies, nutrition information may be presented in the simplified format when a food product contains insignificant amounts of six or more of the following: Calories, total fat, sodium, total carbohydrate, dietary fiber, total sugars, added sugars, protein, vitamin D, calcium, iron, and potassium.*

*Note: There are other provisions in 21 CFR 101.9(f) that may be applicable to your product.

An example of the simplified display is below. Click HERE for examples of all label formats. The simplified format noted below is on page 7 of the document outlining all label formats noted above.

Simplified Display