

Label Verification 101:

Building a Bulletproof Process from Artwork to Shelf

Today's Presenter:

Tony Lukas
The Acheson Group



FSMAFRIDAY

Monthly Industry News, Updates & Trends for Food, Beverage, & CPG Manufacturers



What is FSMA Fridays?

- ✓ Monthly FSMA Related News
- ✓ Regulation Changes & Updates
- ✓ Industry Trends
- ✓ Q&A with TAG



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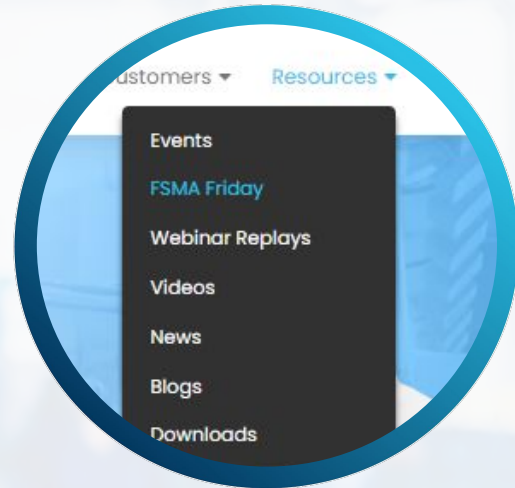
A global food safety and public health consulting group made up of seasoned industry experts.



Award-winning digital plant management platform to visualize plant-wide performance and better control quality, yield & production optimization.

Before We Get Started...

- ✓ Only panelist microphones are on
- ✓ Ask questions! (Q&A at end)
- ✓ Recording link will be shared
- ✓ Audio issues: use call-in number



Watch prior FSMA Friday recordings at [safetychain.com > Resources > FSMA Friday](https://safetychain.com/resources/fsma-friday)

Meet Your FSMA Friday Speaker

Tony Lukas

Director, Food Safety and Dietary Supplements



Tony has over 12 years of experience in the Dietary Supplement and Food/Beverage industries. He has experience leading teams in Regulatory Affairs, QA, and Scientific Affairs. Tony has helped companies implement and receive certifications in USDA Organic, various GFSI schemes, GMP, and multiple third-party certifications. Throughout his work, he has had experience helping his companies navigate through FDA audits, Warning Letters and recalls, as well as designing and reviewing hundreds of labels for finished products in the food/beverage and dietary supplement industries.

Tony has worked for PepsiCo, General Mills, Standard Process, and a few other small companies throughout his career. He is a strong believer that all departments in a company should be in sync with each other to ensure the finished products are manufactured safely, are fully traceable, and marketed in an appropriate and legal manner.

Tony received his Master of Science degree in Food Science and Technology from Virginia Tech. His career passions include label design, risk analysis, allergen control, and improving education and communication among people with different backgrounds in the manufacturing industry.



Agenda

01.

Recent Regulatory Updates

02.

Label Verification 101: Building a
Bulletproof Process from Artwork to Shelf

03.

Q&A

04.

SafetyChain Demo

Recent Regulatory Updates Overview

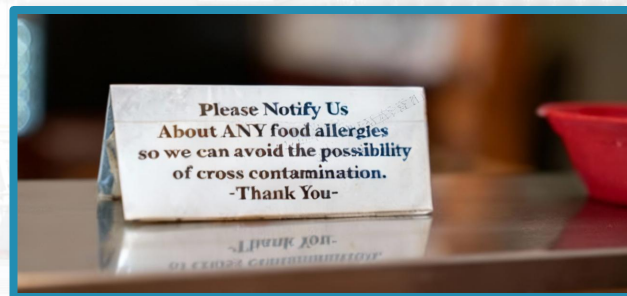
FDA Announces Updates to Modernize and Strengthen Pesticide Monitoring Program

- Risk based sampling focusing on foods consumed by infants and children first
- Procedures and methodologies updated
- Collaboration with other FDA centers, other federal agencies, states, and local counterparts.



EU Ban of BPA Starts July 1st

- Encompasses all food packaging
- Expands on existing ban with baby bottles



Label Verification 101: Building a Bulletproof Process from Artwork to Shelf

What is label verification and why is it important for your company?

The process of label verification includes having all the mandatory (and optional) information on a product label reviewed for accuracy, compliance to regulatory requirements, and then using the correct version during your production run.

Poll 1

How do you verify labels today, from artwork to finished product?



- A** Manual checks against a paper checklist

- B** Spreadsheets or shared docs

- C** A digital system, but not built for label control

- D** A dedicated, version-controlled label verification system

What is Label Verification and Why is it Important for Your Company?

Recalls

Labeling errors (including incorrect labeling of allergens) accounted for **~45% of recalls in 2024** in the US according to the FDA. **

Estimated to be **\$1.92 billion in direct losses.****

Lost time, rework, material costs, reprints, extra paperwork, increased recall insurance premiums, reputational and PR costs for future business.

**Delzell, S. (2026, June 9). The Hidden Cost of Label Errors in Food Manufacturing.
<https://www.supplychain247.com/article/hidden-cost-label-errors-food-manufacturing>

What is Label Verification and Why is it Important for Your Company?

Lawsuits

Reputational harm –
loss of consumer
confidence.

- Missing allergens
- Inaccurate nutritional facts or nutritional claims
- Sourcing or manufacturing claims
- “Slack-fill” lawsuits
- Misleading images
- False health claims
- Inaccurate ingredient claims (like grass-fed)

- FDA
- FTC
- Law firms
- Consumers
- Class-action
- Attorneys general

What is Label Verification and Why is it Important for Your Company?

Potentially Harming Your Consumers

Incorrectly labeling allergens can lead to Serious Adverse Health Consequences or Death(SAHCODHA) for your consumers.

More than just the major 9. Incorrect ingredient list means someone allergic to something unique may not know.

Guilt of accidentally hurting someone.



Categories of Label Information

Mandatory
labeling
information

Optional
labeling
information

Marketing
claims and
images

Mandatory Labeling Information

Principal Display Panel (PDP) needs to have:

- Statement of identity (SOI)
- Product name (if different from SOI)
- Net quantity (in correct units) at minimum

- Name and address of manufacturer (or packer/distributor)
- Ingredient List
- Allergen “contains” statement
- Nutritional Facts panel
- Serving size as packaged
- Servings per container



Optional Labeling Information

UPC Barcode

Precautionary Allergen Labeling (PAL):

- “May contain”
- “Made in a facility which also processes”
- etc.



Claims:

- Qualified health claim
- Structure/function claim
- Nutrient content claim

Images and marketing “fluff”

Common Reasons for Label Verification Errors

Changes to
formula

Changes to
label design

Printer errors

Communication
breakdown
between
departments

Incorrect/
missing
information
from ingredient
suppliers

Label Verification Process Potential Breakdowns



Label design (initial design or if changes occurred).



Sending/ordering from printer.



Verifying upon arrival to facility.



Using incorrect label on equipment during run.



Final verification before release of finished product.

Poll 2

Where in your process is a label error most likely to slip through?



- A** Design or artwork changes

- B** Ordering and proofing with the printer

- C** Verifying label rolls when they arrive

- D** The wrong version getting loaded on the line

Prevention Methods

Label Design

- Use checklists or digital program to verify all mandatory information is present on label in correct locations with correct sizing.
- Label creators should confirm all optional information is correct and they have documentation to back all information up.
- Verify the formula is correct.
- Use version numbers for each formula and label.
- Potentially hide version numbers on labels in corners to know which label version is being used.

Prevention Methods

Records and Version Control

- Keep records of formula versions and label versions.
- Connect all label versions to a formula version number.
 - For example, version 6 of formula may have 3 different versions of label that can be used due to marketing changes instead of mandatory changes.
- Every label version should have a formula version they are connected to in the database.
- Document exactly what changed from one label to the next so you don't have to guess when reviewing.

Poll 3

Are your label versions formally linked to a formula or spec version in a controlled record?



- A** Yes, every label version maps to a formula version

- B** Partially, we track versions but not the linkage

- C** No, version control is informal or inconsistent

- D** Not sure

Prevention Methods

Sending and Ordering from Printer

- When ordering from printer, verify the label they have received by version number (and date it was sent to them) and if possible, review in the printer's digital portal.
- Check all mandatory and optional information.



Prevention Methods

Verifying When Arriving in Facility

- When the label rolls arrive in the facility, they should be reviewed with checklist or an AI review program for:
 - version number
 - mandatory information (especially allergens)
 - Optional information
- Labels (including version number) should be logged into inventory and receive a confirmatory verification signature.

Prevention Methods

Using Incorrect Label on Equipment During Run

- Operators running the packaging equipment should know exactly which label versions they are using.
- Put up placard or have computer screen with production schedule/formula and label versions at equipment.
- If using multiple label versions for same formulation during run, make sure to have a clean break (lot change) and change out placard or update screen when the change is made.
- If only using 1 version of label for run, place any previous label versions of that product in a controlled/locked cabinet so they cannot be accidentally used again.

Prevention Methods

Final Verification Before Release of Finished Product

- Label team should verify labels are correct on finished product (including version and mandatory information).
- Compare labels to what is listed on the scheduled run batch records.
- Keep records of all labels used



Cross Functional Process

Multiple departments should be involved:

- Label team/FSQA
- R&D
- Operations/Scheduling
- Marketing & Sales

When to bring in label team?

Who should be signing off on label changes?



Summary Label Verification

Labeling errors are a huge reason for recalls, loss of profits, and could injure consumers.

Label Verification is a cross-functional team process.

Multiple ways to improve label verification.

Poll 4

In the last 24 months, has a labeling error caused a recall, hold, rework, or near miss at your facility?



- A** Yes, a recall or market withdrawal

- B** Yes, caught internally as a hold, rework, or near miss

- C** No, but we know the risk is real

- D** None that we're aware of

FSMA FRIDAY

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Questions?



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Friday
July 31



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12:00 PM ET

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