

FDA REGULATIONS REVIEW CHECKLIST

Tip: Use this checklist in conjunction with our more comprehensive [Nutrition Facts Labeling Compliance](#) checklist.

checklist items

FINAL REGULATIONS WITH 2023 COMPLIANCE DATE

Sesame Allergen Labeling. The compliance date for declaring Sesame as an allergen on product packaging is January 1, 2023.

- Review ingredient lists (both internal and from suppliers) and look for any Sesame alternative names (Examples: benne or benniseed, tahini, bijan, ellu, geching, and more).
- If an ingredient statement says spices, seasoning, or flavoring, double check for Sesame and contact your suppliers if clarification is needed.

FINAL REGULATIONS YOU SHOULD START PREPARING FOR NOW

Final Rule: FSMA 204. The [Food Traceability Final Rule](#) was published November 2022, compliance date January 20, 2026.

- Review the FDA's [Food Traceability List](#) to determine if you have impacted items.
- Start reviewing your recordkeeping processes to determine what information you capture today and what gaps need to be addressed.

Final Rule: Standards of Identity for Yogurt. The compliance date of this final rule is January 1, 2024.

- Review the updated standards of identity for yogurt provided by the FDA.
- Review and adjust formulas and recipes to better align with the new standards of identity.

REGULATIONS TO KEEP YOUR EYE ON

Proposed Rule: Nutrient Content Claims; Definition of Term “Healthy.” The FDA is proposing to update the definition for the implied nutrient content claim “healthy.”

- Review the proposed rule and watch the FDA webinar on “Healthy” to understand the key changes.
- Review current food claims on products to ensure anything labeled “healthy” meets the new qualifications.

Draft Guidance: Action Levels for Lead in Juice. The FDA published draft guidance for reducing lead levels in juices.

- Review lead levels in juice (proposed new levels are: 10ppb for apple juice, 20ppb for other juice).
- Review good manufacturing practices already in place and make adjustments to reduce the presence of harmful toxins, including lead, in juice.

