

|  | EnergyGuide   | Nutrition Facts   | Over-The-Counter Drug Facts   | Lighting Facts (FTC)<br>Mandatory, intended for consumers<br>Covers all bulbs with a medium base  | Lighting Facts (DOE)<br>Voluntary, intended for retail buyers,<br>utilities, and lighting pros.<br>Covers all LED lighting products  | Laser Safety Facts<br>(proposed)   |
|--|---|---|---|---|--|--|
| Sample label   |   |   |   |   |  |  |
| Lead agency  | Federal Trade Commission, based on Department of Energy test procedures   | Food and Drug Administration  | Food and Drug Administration  | Federal Trade Commission  | Department of Energy   | Proposal for standards bodies, FDA or other  |
| First published/appeared on products   | 1979/1980   | 1990/1994   | 1999/2002   | 2007/2011   |  | 2013/2014. First use by a manufacturer, August 2014.   |
| U.S. law or regulation   | 16 CFR 305  | Nutrition Labeling and Education Act 21 CFR 101   | 21 CFR 201  | 16 CFR 305.2 and 305.3  | Free, voluntary program. "Those [manufacturers] that join send a signal to buyers that they are committed to accurate reporting of their products' performance."   | Currently in development. Initially voluntary, may become a standard or an FDA requirement   |
| Website for more information about the label   | <a href="http://www.business.ftc.gov/documents/bus-82-energyguide-labels-faqs">http://www.business.ftc.gov/documents/bus-82-energyguide-labels-faqs</a>   | <a href="http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064904.htm">http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064904.htm</a>   | <a href="http://www.fda.gov/Drugs/ResourcesForYou/Consumers/ucm143551.htm">http://www.fda.gov/Drugs/ResourcesForYou/Consumers/ucm143551.htm</a>   | <a href="http://business.ftc.gov/documents/bus26-lighting-facts-questions-and-answers-manufacturers">http://business.ftc.gov/documents/bus26-lighting-facts-questions-and-answers-manufacturers</a>   | <a href="http://www.lightingfacts.com/Library/Content/Label">http://www.lightingfacts.com/Library/Content/Label</a>  | <a href="http://lasersafetyfacts.com/about.html">http://lasersafetyfacts.com/about.html</a>  |
| Interface with standards organizations such as ANSI  |   |   |   |   | <a href="http://www.1.eere.energy.gov/buildings/ssl/standards.html">http://www.1.eere.energy.gov/buildings/ssl/standards.html</a>  | Expected to incorporate labeling requirements of IEC and ANSI as applicable. Small changes may be made for readability or additional consumer information.   |
| What is covered?   | Clothes washers, refrigerators, freezers, televisions, water heaters, dishwashers, room air conditioners, central air conditioners, furnaces, boilers, heat pumps, and pool heaters.  | Pre-packaged foods, and foods sold that make nutrition claims. Exempt: restaurants, carry-out, bakery, deli, foods with no nutrition (coffee, spices), dietary supplements, fresh produce and seafood (voluntary program of shelf signs), donated free food (only food "offered for sale" is covered).  | Over 100,000 over-the-counter drugs   | Required on packaging for lamps with medium screw bases, including incandescent, CFLs and LEDs  | Voluntary for LED lighting products. Intended for retail buyers, utilities and lighting professionals to evaluate LED ("solid-state lighting") product performance.  | Consumer and entertainment (projector) lasers emitting in the visible spectrum. Does not include modules where a laser head is separate from a power supply needing to be wired or otherwise non-trivially connected to the laser head.  |
| What information is required on the label?   | Varies with product. Sample: Manufacturer name, model number, capacity or size, estimated annual operating costs, comparison to similar models, estimated electricity costs   | On Nutrition Label itself: Standard serving size, calories, total fat, sodium, carbohydrates, protein, calories from fat, saturated fat, trans fat, cholesterol, sodium, dietary fiber, sugars, vitamin A, vitamin C, calcium, iron.<br><br>On Information Panel: Name of food, net quantity statement or amount of product. Ingredients listed in decreasing order of predominance by weight. Manufacturer name, city or town, state, country, zip.<br><br>If a food contains one or more of eight allergens, the allergen(s) must be listed; for example, "Contains: Wheat, Milk, Tree nuts." | Active ingredients; purpose of the product; uses of the product; specific warnings including when it should not be used, when a doctor should be consulted, and side effects; dosage instructions, inactive ingredients.  | Light output in lumens, estimated annual energy cost, life of lamp, color temperature, wattage, Energy Star logo (only if qualified), mercury disposal statement  | Light output in lumens, efficiency (lumens per watt), color rendering index (CRI), correlated color temperature (CCT), wattage. Testing procedure, registration number (in label program), brand, model number, type.<br><br>Optional: "Lumen maintenance" which is roughly lifetime, warranty   | Standards or government mandated safety label plus laser parameters (including minimum divergence), laser hazards listing, safe use guidance, device-specific guidance (such as for laser projectors), QR code and URL for more info, optional manufacturer info and contact.  |
| Does the label include a link to a website?  | Yes: "For more information, visit <a href="http://www.ftc.gov/energy">www.ftc.gov/energy</a> "  | No  | Apparently not  | For CFLs: "Contains Mercury / For more on clean up and safe disposal, visit <a href="http://epa.gov/cfl">epa.gov/cfl</a> ."   | "Visit <a href="http://www.lightingfacts.com">www.lightingfacts.com</a> for the Label Reference Guide"   | QR code and URL for more info. Two main types: general QR code which leads to laser Class info page (for 2, 3R, 3B and 4), or specific QR code which encodes laser parameters to generate a webpage with specific hazard distances etc. for that laser.  |
| Where is the label required on the packaging?  |   | The "Information Panel" which is the panel immediately to the right of the Principal Display Panel.   |   |   |  | On outer (retail) packaging; marketing materials including websites, brochures, catalogs; temporary or permanent label on device (if device is large enough) or on a "hang tag"; as information in the user manual.  |
| Does the label have to be pre-approved by the agency?  |   | "No, it is the responsibility of the manufacturer or importer of a food to comply with current food labeling regulations."  |   | Does not require approval from FTC before labeling and selling products.  | DOE requires testing to ensure claims are valid, in accordance with IESNA standard LM-79-2008, Approved Method for the Electrical and Photometric Testing of Solid-State Lighting Devices.   | Does not require approval from an authority. Manufacturer is responsible for accuracy of classification and laser parameters. If testing house is used, the lab and report number can be included on the label to indicate compliance "above and beyond" what is minimally required.   |
| Is there a special label for smaller sizes?  | Yes, a smaller horizontal or vertical format for televisions  | Yes, items with limited nutrients can have more basic labels. Label info can also be put in a horizontal format as shown below.   | Label info can be broken up into two columns if needed (example; a thin square package with no single long surface)   | Yes, if package surface area is less than 24 square inches  | Not needed or available, since the program does not require labeling of packages. Labels only appear on websites, marketing materials, etc.  | Yes, smaller labels are intended for packaging on products that do not have room for the full Laser Safety Facts labels. These are modeled after the minimum requirements of IEC 60825, but with a few adjustments including addition of a QR code. Other formats are also possible as long as they meet regulatory standards, have QR codes, and -- for pointers and handhelds -- include an aviation safety warning. |
| Sample smaller or horizontal format label  |   |   |   |   |  |  |
| Minimum type size  |   | 8 point for key data, 6 point for secondary data  | "The label also requires a type size large enough to be easily read and specific layout details--bullets, spacing between lines, and clearly marked sections--to improve readability."  |   |  | 7 point type minimum.  |
| Other languages required or permitted?   |   | Bilingual is OK, either separate labels or English/Language2.   |   | Bilingual is OK, either separate labels or English/Language2. Trilingual is not permitted.  |  | Bilingual is easiest by duplicating the text either in a completely separate label, or with primary then secondary language inside each section. A bilingual sample label has not yet been developed.  |
| Manufacturer provide online?   | You must post images of the EnergyGuide labels for products on a publicly available website in a way that allows retailers to hyperlink to the label or download it. The label for a specific model must remain on the website for six months after production ends. See 16 CFR § 305.6   | Does not appear to be a requirement   | Does not appear to be a requirement   | Yes. Manufacturers must post images on a public website so retailers can link or download the label. Must remain on website for 6 months after production of that model ends.   | Does not explicitly require. DOE's program is for manufacturers to communicate with retail buyers, utilities and lighting pros, so the label would be expected to be used on websites, marketing materials, etc. which are targeted to these groups  | It is suggested that manufacturers provide the Laser Safety Facts label for each of their consumer visible laser products, on their website, marketing materials, etc.   |
| Provide marketing info to end purchaser in catalogs and websites?                                      | Any manufacturer, distributor, retailer, or private labeler who advertises a product with an EnergyGuide label on a website or in a print catalog must show the EnergyGuide label. However, this requirement applies only to websites and print catalogs that contain the terms of sale, retail price, and ordering instructions for consumers.<br><br>The labels must be clear and conspicuous and in close proximity to the product's price on each page that contains a detailed description of the product.<br><br>If the website hyperlinks to the image of the label, it must use the <a href="#">sample EnergyGuide icon</a> (i.e., web button) provided by the FTC. The website must hyperlink the image so that consumers don't have to save the hyperlinked image to view it. See 16 CFR § 305.20 | The Nutrition Label and nutrition information in general appears only to be required on point-of-sale packaging. FDA and other agencies may regulate nutrition claims such as "Low fat" in advertising.   | Does not appear to be a requirement   | Any manufacturer, distributor, retailer, or private labeler who advertises a general service lamp on a website or in a print catalog must post the Lighting Facts label. However, this requirement applies only to websites and print catalogs that contain the terms of sale, retail price, and ordering instructions for consumers.<br><br>The labels must be clear and conspicuous, and appear in close proximity to the lamp's price on each page that contains a detailed description of the lamp.<br><br>If the website hyperlinks to the image of the label, it must use the <a href="#">sample Lighting Facts icon</a> (i.e. web button) provided by the FTC. The website must hyperlink the image so that consumers don't have to save the hyperlinked image to view it. See 16 CFR § 305.20 | The DOE label is specifically designed for manufacturers to communicate with retail buyers, utilities and lighting pros, so the label would be expected to be used on websites, marketing materials, etc. which are targeted to these groups.<br><br>It is not required or intended for end-user consumers.  | It is suggested that any manufacturer, distributor, retailer, or private labeler who advertises a consumer visible laser product on a website or in a print catalog should post the Laser Safety Facts label.<br><br>If the website hyperlinks to the image of the label, it must use the <a href="#">sample Laser Safety Facts icon</a> (web button) provided, as shown below.  |
| Icon required for hyperlinks on website (clicking icon leads to separate page with image of the label) |   | Not applicable; the Nutrition Label is not required on websites   | Not applicable  |   |  |  |
| Provisions for special situations?   |   | "Q: I have tried all the available format options, but without some modification I can not make them work on my label, what can I do?<br>Answer: Under 21 CFR 101.9(g)(9), FDA may permit alternative means of compliance or additional exemptions to deal with special situations."  |   |   |  |  |
| Exemptions for small businesses?   |   | Nutrition Facts label is required only if 1) annual gross sales of food to consumers is above \$50,000 AND 2) total sales of food and non-food items are above \$500,000  |   |   |  |  |
| Additional notes and features  |   | A Nutrition Label can have two sets of information, "As packaged" and "As prepared" such as for cereal where milk is added, or a cake mix where eggs are added.<br><br>"Q: If we nutrition label in good faith, will FDA take legal action involving small mistakes?<br>Answer: FDA is unlikely to take regulatory action for minor errors. However, such errors should be corrected during the next printing of labels."   | "Along with the standardized format, the label uses plain-speaking terms to describe the facts about each OTC drug. For example, "uses" replaces "indications," while other technical words like "precautions" and "contraindications" have been replaced with more easily understood words and phrases." | A cost estimate is given for testing an A19 LED replacement lamp. Total testing cost is \$2008, representing: 6 samples at \$25 retail plus tax (\$168), procurement cost including shipping and handling (\$500), and an LM-79 sphere test (\$1350).<br><br>The webpage <a href="http://www.lightingfacts.com/Products">http://www.lightingfacts.com/Products</a> includes a feature where you can search for products based on use location, mounting base, lumens, wattage, CRI, CCT and other factors. 11,055 products are currently in the database.   | Three domains are used. <b>LaserSafetyFacts.com</b> is the main domain; all webpages are hosted at this address. The other two domains automatically redirect to the equivalent LaserSafetyFacts.com pages.<br><br>The domain <b>LaserSafety.info</b> is intended for human-readable use on the labels affixed to lasers. A short phrase such as "Visit LaserSafety.info/3B" indicates there is a website address with additional safety info.<br><br>The domain <b>LSF.me</b> is used to shorten the URL address that is encoded into QR and Data Matrix codes. A shorter URL makes the individual blocks in the QR or DM code larger, and thus easier to read. |  |