



Hemp Edibles Labeling Checklist

20.10.2 NMAC REQUIREMENTS ([current version 01.28.26](#)):

General Requirements

- Labels in English, or contain both foreign language and English (see 13.B(4))

Principle Display Panel (front label facing consumers on shelf)

- Statement: product is produced from hemp (see 13.C(1))
- Unless broad spectrum: statement indicating the product contains THC (see 13.C(2))
- CBD content per serving in mg (see 13.C(3))
- CBD content per package in mg (see 13.C(3))
- Total THC per serving in mg (see 13.C(4))
- Total THC per package in mg (see 13.C(4))

Other Requirements

- FDA statement (or similar approved statement) (see 13.D(1))
“This product is not approved by the FDA to treat, cure, or prevent any disease. The FDA has not evaluated this product for safety, effectiveness, and quality. This product may cause unknown interactions with other medications and long-term adverse health effects.”
- Pregnancy, may become pregnant, or breastfeeding statement (see 13.D(2))
- Keep out of reach of children statement (see 13.D(3))
- Unless broad spectrum: Potential to cause positive drug test statement (see 13.D(4)(a))
- Unless broad spectrum: Potential to create impairment (see 13.D(4)(b))
- Does NOT contain: medical, health, or benefit claims, including claims that the product can, or is intended to, diagnose, cure, mitigate, treat, or prevent disease (see 13.E(1))
- Is NOT designed to appeal to children (cartoons, a design, brand, or name that resembles non-hemp product marketed to minors) (see 13.E(2)(a-b))
- Does NOT contain: symbols or celebrities commonly used to market to minors (see 13.E(2)(c))
- Does NOT contain images of minors (see 13.E(2)(d))
- Does NOT contain products that are commonly associated with minor (i.e. candy, candied) (see 13.E(2)(e))
- Statements referring to “no THC” not used (see 13.E(3))
- QR code allowances/requirements met (see 13.H)
- Accurate dosing device provided (see 13.J)

21 CFR 101 REQUIREMENTS ([based on the FDA Food Labeling Guide](#))*:

Principle Display Panel (front label facing consumers on shelf)

- Statement of identity (name of food) present, properly located and aligned, use of common food name (see 3.3; 4.3-9)



- Statement of identity bolded, reasonably sized to the most prominent printed matter (see 4.2)
- Net quantity statement (amount of product in package), properly located (bottom 30%), and stated in weight, measure, or numeric count (see 3.3; 5.1-2; 5.6)
- Net quantity statement in U.S. Customary System (oz, lb, fl oz) and metric (gr, kg, ml, l) (see 5.3)
- Net quantity statement meets minimum type size (see 5.4-5)
- Net quantity statement does not use qualifying phrases (i.e. "Large" oz.) (see 5.10)
- Artwork does not hide/detract from label statements (see 4.10)
- Foreign language used, also includes all wording in English (see 4.12)

Information Panel (panel to the right of the Principle display panel)

- Ingredient list present and includes sub ingredients (see 3.5; 6.15)
- Ingredients listed in order of weight, with what weighs most listed before other ingredients weighing less (see 6.2)
- Ingredient list on same panel as name and address of manufacturer (see 6.3)
- Ingredient list font type size minimum 1/16' on lower case letter "o", or very small package (see 3.6; 6.4)
- Ingredients listed using common or usual name (see 6.6)
- Ingredients: Spices, natural flavors, artificial flavors, trace ingredients properly labeled (see 6.7-10)
- Nutrition Facts present, exempt, or special provisions met (see N1)
- Nutrition Facts properly located and formatted (see G1 and [new FDA formatting](#), [new font types/sizes](#))
- Nutrition Facts: Requirements of N2-37 and P1-8 met
- Name and address (or phone # in place of address) of manufacturer, packer, or distributor listed (see 3.5; 3.8)
- Qualifying statement of facility's relation to product (i.e. "manufactured for", "distributed by") (see 3.8)
- No intervening material (information/graphics not required) (see 3.5; 3.7)

Food Allergen Labeling (milk, egg, fish, crustacean shellfish, tree nuts, wheat, peanuts, soybeans, sesame seeds)

- Allergens identified, labeled, and on information panel (see F1-7)
- Allergen listed in parenthesis following name in ingredient statement OR in "Contains" statement after ingredient list (see F13-14)
- "Contains" statement properly formatted and lists ALL major food allergens in product (see F15-16)
- Type of tree nuts, species of fish or crustacean shellfish specified (see F8-10)

Juices

- Beverages that claim to contain juice declare % of juice, or meet exemption of J3 (see J1)
- % juice on information panel near top (see J2)
- "beverage", "drink", "cocktail" or similar used for diluted juice(s) (see J5)
- Juices made from concentrate state "from concentrate" or "reconstituted" (see J6)
- Applicable requirements of J7-32 met



Colors

- Colors properly labeled (see C1-4)

Claims

- Nutrition content claims meet requirements (see N1-51)
- Health claims meet requirements (see H1-6; Q1-10; S1-7)

* The checklist found in this checklist related to 21 CFR 101 include the most often used requirements, not a complete list of the requirements outlined in 21 CFR 101. Additional requirements may exist depending on the type of product being labeled.