Marlow & Pine LLP
FOOD AND DRUG REGULATORY PRACTICE

1200 Harbor Street, Suite 400
Seattle, WA 98101
(206) 555-0142 · marlowpine.example

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November 19, 2026

Ridgeline Pantry
Attn: Product and Quality Team
88 Mill Road
Boulder, CO 80302

RE **Label review, Peanut Butter Oat Cookies**

ARTWORK Back panel, Nutrition Facts

Dear Ridgeline team,

Thank you for sending the label artwork for Peanut Butter Oat Cookies. We reviewed the Nutrition Facts panel against 21 CFR 101.9. This letter sets out what needs to change before print and what we need from you.

Summary

4
to address

114
checks with no finding

16
need information

What needs to change

	FINDING	LEVEL	SUGGESTED CHANGE
1	**Calories is not rounded as FDA requires** Nutrition Facts › Calories › Amount	Required	210
2	**Sodium is not rounded as FDA requires** Nutrition Facts › Sodium › Amount	Required	140 mg
3	**Potassium %DV does not match the amount declared on the label** Nutrition Facts › Potassium › %DV	Required	4%
4	**Added sugars %DV is missing** Nutrition Facts › Added Sugars › %DV	Required	a %DV, from its 50 g Daily Value

Details

Finding 1: Calories is not rounded as FDA requires

On the label: 213
Suggested change: 210
Why: 213 is above 50 calories, so it rounds to the nearest 10. That is 210.
Rule: 21 CFR 101.9(c)(1)

> *"A statement of the caloric content per serving, expressed to the nearest 5-calorie increment up to and including 50 calories, and 10-calorie increment above 50 calories, except that amounts less than 5 calories may be expressed as zero."*

Finding 2: Sodium is not rounded as FDA requires

On the label: 143mg
Suggested change: 140 mg
Why: 143 mg is above 140 mg, so it rounds to the nearest 10 mg. That is 140 mg.
Rule: 21 CFR 101.9(c)(4)

> *"A statement of the number of milligrams of sodium in a specified serving of food expressed as zero when the serving contains less than 5 milligrams of sodium, to the nearest 5-milligram increment when the serving contains 5 to 140 milligrams of sodium, and to the nearest 10-milligram increment when the serving contains greater than 140 milligrams."*

Finding 3: Potassium %DV does not match the amount declared on the label

On the label: 3%
Suggested change: 4%
Why: 150 mg ÷ 4,700 mg = 3.19%. A mineral at 10% or less rounds to the nearest 2%. That is 4%.
Rule: 21 CFR 101.9(c)(8)(iii)

> *"The percentages for vitamins and minerals shall be expressed to the nearest 2-percent increment up to and including the 10-percent level, the nearest 5-percent increment above 10 percent and up to and including the 50-percent level, and the nearest 10-percent increment above the 50-percent level."*

Finding 4: Added sugars %DV is missing

On the label: no %DV (8g)
Suggested change: a %DV, from its 50 g Daily Value
Rule: 21 CFR 101.9(d)(7)(ii)

> *"A listing of the percent of the DRV as established in paragraphs (c)(7)(iii) and (c)(9) of this section shall be given in a column aligned under the heading "% Daily Value" established in paragraph (d)(6) of this section with the percent expressed to the nearest whole percent for each nutrient declared in the column described in paragraph (d)(7)(i) of this section for which a DRV has been established..."*

What we need from you

Please send these, and we will complete the 16 checks the label alone cannot settle, including the Saturated Fat %DV. Some checks need more than one document.

- The formula or a supplier spec sheet, with unrounded values (13 checks)
- The front panel and the package size (7 checks)
- A lab result (2 checks)
- The preparation directions, if the food is prepared (1 check)

Scope and limits

We reviewed only the Nutrition Facts panel listed above. We did not test the product. Values are taken as printed. Type size and layout, the front panel, the ingredient statement and allergens were not part of this review. This letter is based on the regulations in effect on the date above.

Please let us know if you have questions.

Sincerely,

Dana Whitlock

Dana Whitlock, Partner
Marlow & Pine LLP

Appendix: checks and limits

CHECKS ON THE NUTRITION FACTS PANEL	COUNT
Ran from the label	119
With a finding	5
Need information from you	16
Not included in this review	2
Do not apply to this panel	40