The Compliance Quick Sheet

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The US packaging rules **map** — which body governs what, and where to verify it. No single agency owns "packaging"; three layers of rules stack, and most packaging must satisfy **all of them at once**.

NOT LEGAL ADVICE — READ THIS FIRST

General information from a packaging manufacturer — **not legal or regulatory advice**. Rules vary by state and product category and change often, so **no thresholds, fees, or deadlines appear here**. Verify every specific **with the authority named in that row** — and with qualified counsel — before you act.

1 · FEDERAL BASELINE
FDA, FTC, CPSC, and EPA rules that apply in every state.

2 · STATE ADDITIONS
Toxics limits, EPR, claim rules — the fastest-moving layer.

3 · CATEGORY RULES
Cannabis, supplements, cosmetics, alcohol add their own.

REGIME & AUTHORITY	WHAT IT GOVERNS — AND THE CLASSIC TRAP	VERIFY WITH
FEDERAL BASELINE — APPLIES IN EVERY STATE		
Food-contact materials FDA · Federal Food, Drug & Cosmetic Act · FDA clears the material for every food; USDA/FSIS requires proof of it (letters of guaranty) for meat & poultry	Any material touching food — plastic, coating, adhesive, ink, board — must be authorized (or otherwise cleared) for the **intended use**: food type, temperature, contact time. "Food-grade" only means something per use — fine for dry goods ≠ cleared for hot, fatty, or acidic. **Prove it on paper:** supplier letters of guarantee + declarations of compliance, on file per material.	FDA (fda.gov) USDA FSIS — meat & poultry
Core & food labeling FDA & FTC · Fair Packaging & Labeling Act; federal allergen & nutrition-labeling law	Product identity, net quantity, responsible company on most consumer packages. Food adds ingredients, major-allergen declaration, Nutrition Facts (Supplement Facts for supplements). The allergen list is set by federal law and has expanded — confirm it, don't recall it. **Trap:** mislabeling is a common recall trigger; most "best by" dating has no single federal standard — states add their own rules.	FDA (fda.gov) FTC (ftc.gov)
Child-resistant packaging CPSC · Poison Prevention Packaging Act · test protocol 16 CFR 1700 · classification ASTM D3475	"Special packaging" for certain hazardous household substances and many medicines. CR is a **test result, not a claim** — child and senior panels — and it must stay **senior-friendly**: a package that defeats seniors does not pass. **Trap:** certified package ≠ certified design — the same cap on a different container may need its own testing. Keep evidence tied to your exact finished package.	CPSC (cpsc.gov) ASTM — D3475
Environmental marketing claims FTC · Green Guides + state "truth in labeling" laws	"Recyclable," "compostable," "biodegradable," recycled-content claims: substantiate every claim; qualify it when many buyers can't actually recycle the item. Decoder: bare chasing arrows ≠ a recyclability promise; the resin code (1–7, ASTM D7611) only names the plastic; How2Recycle is a standardized, member-reviewed instruction. **Trap:** some states restrict chasing-arrows / recyclable claims unless genuinely recycled in-state — check every state you sell into.	FTC (ftc.gov) How2Recycle each state's law
STATE LAYER — VARIES BY STATE & ACTIVELY CHANGING		
Toxics in packaging & state warnings State legislatures (model toxics laws) · EPA under TSCA · California Prop 65	State limits on heavy metals and restricted chemicals in packaging; PFAS-in-food-packaging is the most active area, and coverage varies by state. California's Prop 65 warnings for listed chemicals can reach the package, not just the product. **Trap:** "FDA-compliant" ≠ "compliant in every state I sell into."	each state's program EPA (epa.gov) CA Prop 65 program
Extended producer responsibility (EPR) State legislatures · run through producer responsibility organizations (PROs)	Producers — generally brand owners or importers — register, report packaging **by material and weight**, and pay fees funding collection & recycling; increasingly eco-modulated (recyclable mono-material tends to pay less). Enacted in a growing set of states (seven at last review, Sep 2026: ME, OR, CO, CA, MN, MD, WA — more pending); statuses move. **Prepare:** a per-SKU inventory — every component, its material, its weight. That is the shape every EPR report asks for.	each state's official EPR program / PRO
CATEGORY LAYER — YOUR PRODUCT ADDS ITS OWN RULES		
Cannabis Each state's cannabis regulator — no federal program	Regulated state by state, and the details don't agree: CR certification, resealability, opacity, mandated warning symbols, and exit packaging all vary. Compliant in one state can be non-compliant next door — and rules revise frequently, sometimes between license renewals.	each state's cannabis regulator + counsel
Supplements · cosmetics · alcohol · pharma FDA (DSHEA; MoCRA for cosmetics) + other federal & state programs	Supplements: Supplement Facts panel; certain products — such as those containing iron — need CR packaging. Cosmetics: FDA oversight modernized by MoCRA — identity, net contents, responsible party, ingredients. Alcohol & pharma carry their own regimes on top.	FDA (fda.gov) your category's authority

STAYING CURRENT IS A PROCESS — NOT A ONE-TIME CHECK

1 Map your footprint
Every category & state you sell into.

2 Assign an owner
Diffuse responsibility is how rules slip.

3 Go to primary sources
The agency itself — not summaries.

4 Subscribe to updates
Agencies, states, standards bodies.

5 Review on a schedule
And on every new market or material.

6 Confirm with counsel
Before artwork goes to plate.

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