

February 2004

Labeling Non-consumer Packages

By Kathy Dresser

The NIST Handbook 130 Uniform Packaging and Labeling Regulation (UPLR) was primarily written to address the packaging and labeling of products intended for retail sale. The UPLR refers to these packages as “Consumer Packages.” In addition, however, the UPLR also provides more limited information regarding the labeling of packages that the manufacturer or packer intended to be sold someplace other than at the retail level (e.g., wholesale, industrial, or institutional sales). The UPLR refers to these packages as “Non-consumer Packages,” and they have different, less stringent labeling requirements.

Declaration of Identity. The declaration of identity must be the same as that for consumer packages, but must only appear on the outside of the package. The declaration of identity on a non-consumer package does not need to appear on the principal display panel, nor does it need to appear generally parallel to the base of the package.

Declaration of Responsibility. The declaration of responsibility on a non-consumer package must contain the same information as that on a consumer package.

Declaration of Quantity. The declaration of quantity on a non-consumer package must only be definitely and clearly stated in English on the outside of the package. There is no requirement that the declaration of quantity appear in the lower 30 percent of the principal display panel, or that it appear generally parallel to the base of the package. The declaration of quantity for a non-consumer package need not comply with the style of type, minimum type size, color contrast, or free area requirements for consumer packages.

These broader, less stringent labeling requirements for non-consumer packages are intended to give the manufacturer or packer flexibility for warehousing and distributing products that may be shipped by the pallet or crate. The information must be present, but the manufacturer or packer is given discretion regarding where and how it is provided to allow for different inventory and storage systems.