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Packaging and Labeling Instructor Training School

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Instructor Training
On September 14 - 18, 2009, the Laws and Metric Group of the Weights and Measures Division (WMD) hosted a week long instructor training school at NIST’s Gaithersburg, Maryland, campus. Participants were provided specialized training on packaging and labeling laws and regulations as outlined in NIST Handbook 130, Uniform Laws and Regulations in the area of Legal Metrology and Engine Fuel Quality.

The school was attended by nine participants from around the country, which included state weights and measures officials from California, Maryland, Nebraska, North Carolina, and Wisconsin. Industry members from Bureau Veritas, Procter and Gamble, and Walmart also attended.

The class focused on the Uniform Packaging and Labeling Regulations (UPLR) as found in NIST HB 130 for consumer and non-consumer packaging requirements; FDA and FTC requirements, and other federal laws and regulations governing packaging and labeling as it pertains to the declaration of identity, responsibility, and quantity. The class consisted of classroom training, hands on examinations of products in the marketplace, a review and study of recent court cases, and a trip to a store to apply and re-enforce classroom training.

These instructors will take the training they received and use it to teach other state officials with the goal of improving compliance in the marketplace and protecting consumers and businesses. The industry participants will work toward better educating and training their employees and suppliers to ensure labeling compliance on the products they carry.

Current Inspection Practices
For many reasons, the inspection and enforcement of packaging and labeling regulations has reduced over the years. Most states inspect net quantity compliance but may not inspect for declaration of identity, responsibility, and quantity. Gone unchecked violations could proliferate into wide-spread abuse, whether intentional or due to lack of industry’s knowledge, and education.
**Recommendation**
When checking packages for net quantity, weights and measures inspectors can include the checking and verification of the declaration of identity, responsibility, and quantity into existing inspection procedures. Inspectors will find that once properly trained and experienced in the field, little additional time and effort is required to perform a packaging and labeling check. This check may include but is not limited to checking:

- Product identity is on the principal display panel (PDP) which accurately describes the contents (not misleading or deceptive).
- A conspicuous declaration of responsibility is provided containing the name and address of the manufacturer, packer, or distributor (the street address can only be omitted if it is shown in a current city telephone directory).
- The net quantity declaration consists of the proper location (lower 30% of PDP), size and style of type or lettering (based on size of PDP), color contrast, unit of measure requirements, and free area as outlined in the UPLR.

**Upcoming Training Opportunities**
WMD is planning two inspector training classes in 2010. One is tentatively planned for April in the central region, and the second for June in the eastern region. We will be announcing specific information regarding the classes to all state directors as soon as the information is available.

Any comments, questions, or concerns can be addressed to David Sefcik at dsefcik@nist.gov or 301-975-4868.