Small Business Nutrition Labeling Exemption (SBNLE)

User Guide

Office of Nutrition and Food Labeling (ONFL)

Office of Food Chemical Safety, Dietary Supplements, and Innovation (OFCSDSI)

U.S. Food and Drug Administration

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Contents

1. About Small Business Nutrition Labeling Exemption Notices
2. Signing In
3. The Dashboard
4. My Exemptions
5. Submitting a New Exemption Notice
    - Step 1: Search for Your Firm
    - Step 2: Firm Information
    - Step 3: Exemption Information
    - Step 4: Products
    - Step 5: Confirmation
6. After You Submit
7. Viewing an Exemption Notice
8. Notes and Messages from FDA
9. Renewing an Exemption Notice
10. Printing Your Receipt
11. Updating a Reviewed Exemption
12. Your Profile
13. Submitting Feedback
14. Help & Reference

Appendix A: Key Rules & Limits
Appendix B: Status Definitions

How to use this guide

Use Word's Navigation Pane or the PDF bookmarks panel to move by heading. Links in the contents and resource sections are underlined and descriptive. The screenshots show sample data and are provided only as visual orientation; the complete instructions are stated in the surrounding text.

> **Accessibility note:** For screen-reader users, each screenshot has alternative text, tables use marked header rows, and no instruction depends on color alone. Button names and status labels are written exactly as they appear in the application where practical.

1. About Small Business Nutrition Labeling Exemption

The Small Business Nutrition Labeling Exemption (SBNLE) module is available through FDA Industry Systems (FIS) and the FDA Unified Registration and Listing System (FURLS). It allows firms to submit exemption notices electronically to the Office of Nutritional Products, Labeling, and Dietary Supplements (ONPLDS). Electronic filing eliminates the need to submit a paper form for the same notice and makes annual renewal easier.

A firm filing a low-volume Small Business Nutrition Labeling Exemption must meet both requirements below:

1. Employ fewer than an average of 100 full-time equivalent (FTE) employees.
2. Sell fewer than 100,000 units of each product in the United States during the 12-month exemption period.

Important: The exemption does not apply to a product if its label, labeling, or advertising provides a nutrient content claim (for example, "sugar free"), a health claim, or other nutrition information.

The exemption applies only to nutrition labeling. It does not change other required label information, such as the statement of identity, net quantity of contents, ingredient statement, allergen information, or the name and address of the manufacturer, packer, or distributor.

Submit one completed notice for each 12-month exemption period. The filing period is based on the start and end dates entered in the notice; it is not tied to January. File annually and keep a copy of each submission for your records.

Small-firm filing exception: A person who is not an importer and has fewer than 10 FTE employees does not need to file an SBNLE Notice for a food product with annual sales of fewer than 10,000 total units.

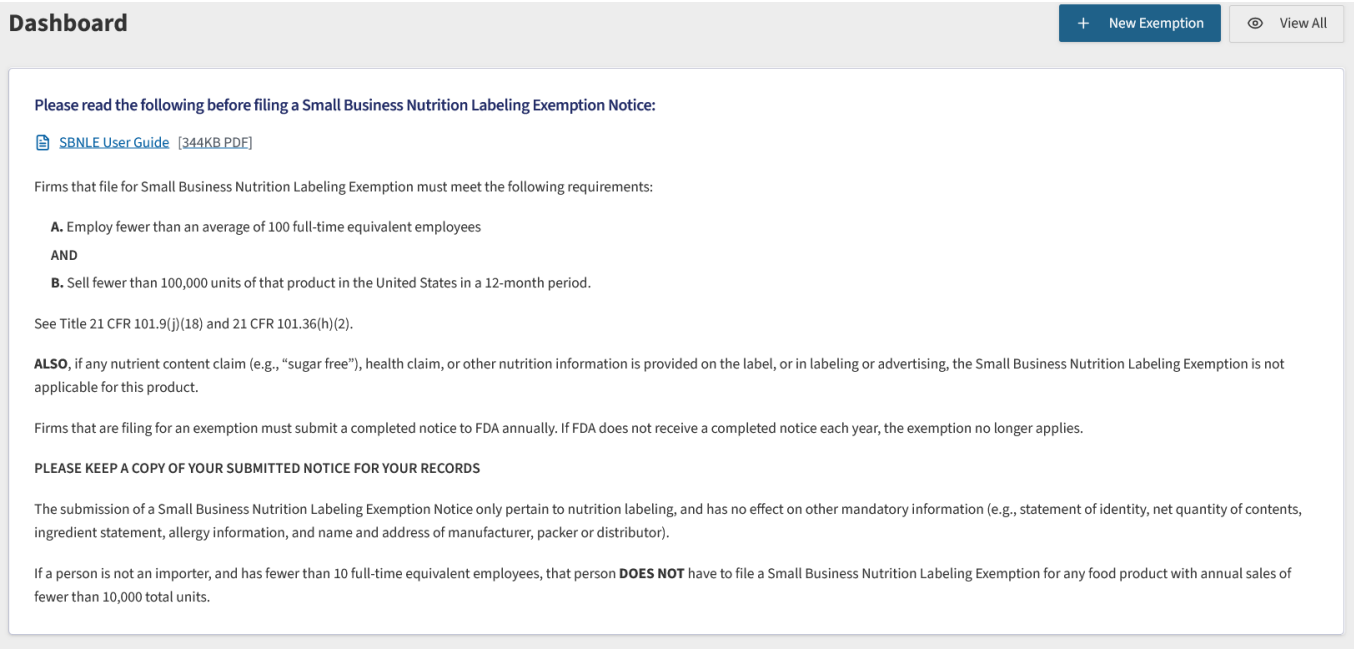


Figure 1. Compliance notice displayed on the Dashboard and at the beginning of a new exemption.

Key terms

Term	Meaning in this guide
FDA Industry Systems (FIS)	FDA portal used to access account management and electronic submission modules.
FURLS	FDA Unified Registration and Listing System within FIS.
Online Account Administration (OAA)	The FIS account-management and authentication area used to manage access and launch modules.
SBNLE	Small Business Nutrition Labeling Exemption Notice module.
FTE	Full-time equivalent employee. The count includes the firm and its affiliates and includes owners as described in the application help.
NLE ID	The system-generated nutrition labeling exemption submission number.
Firm	The person or business claiming the exemption, including all domestic and international affiliates.
Reviewed	FDA review has been completed and the notice is currently in effect. This status should not be read as a separate FDA approval of the product.

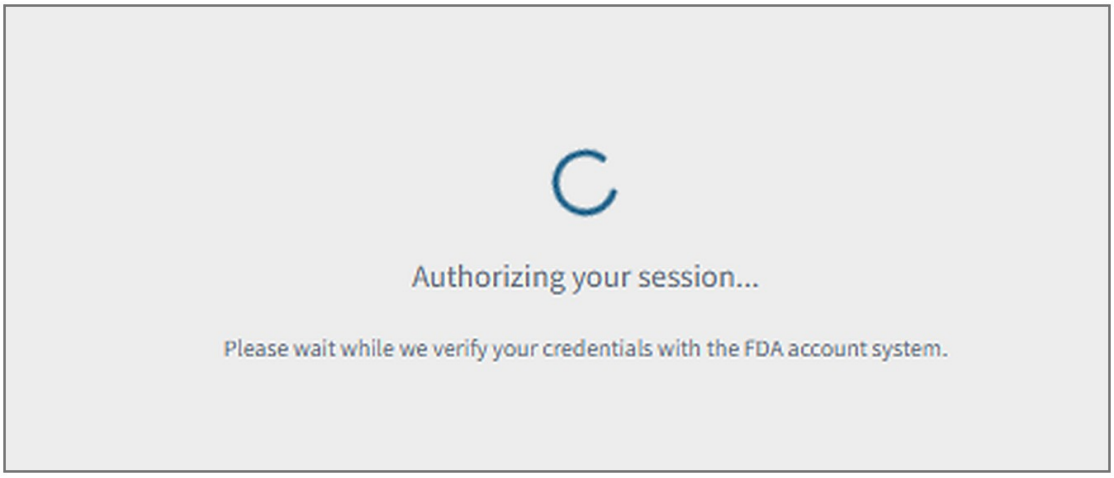
2. Signing In

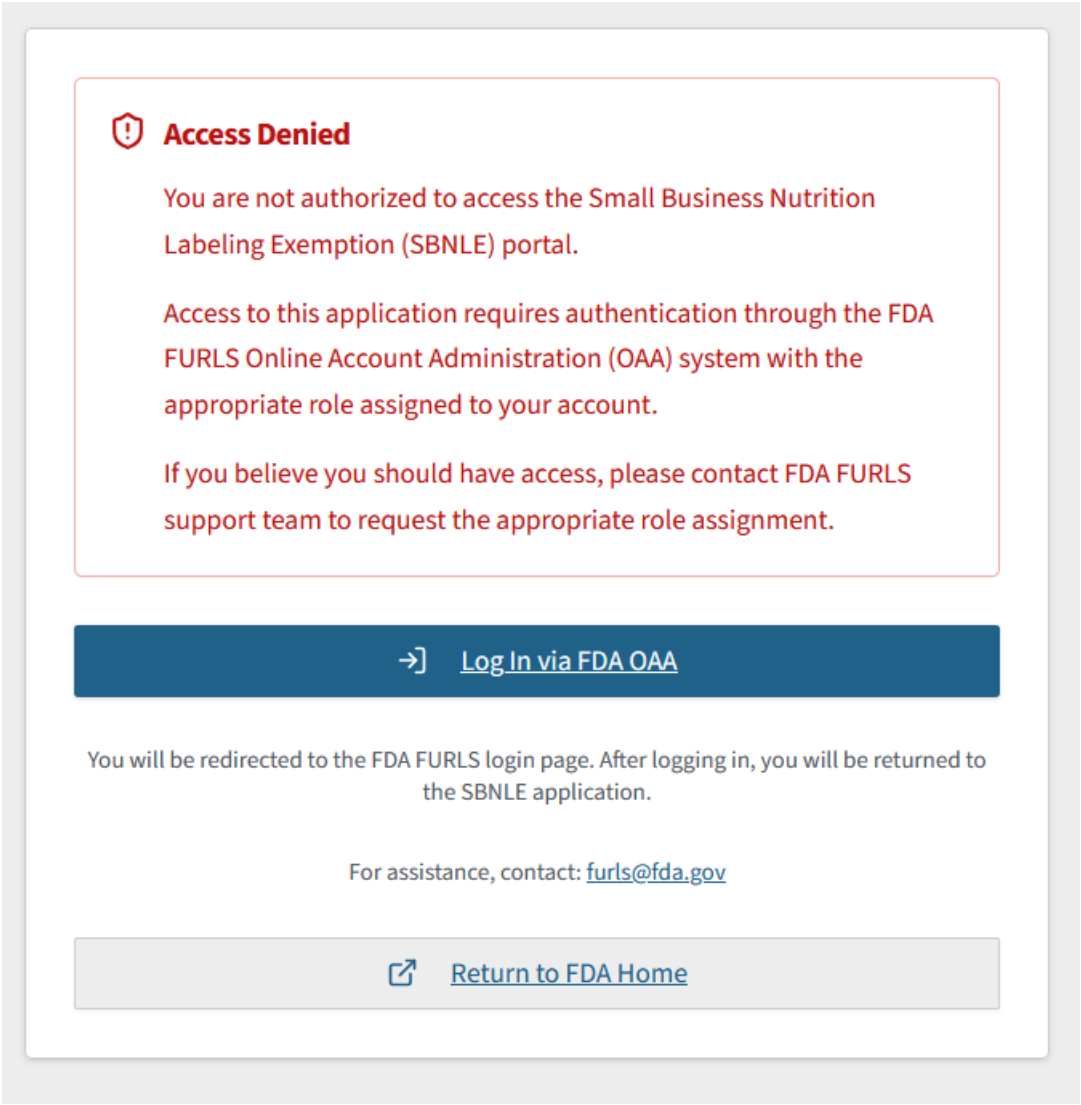
SBNLE does not use a separate username and password. Access is provided through your FDA Industry Systems account and assigned module access.

1. Go to FDA Industry Systems and select Log In.
2. Enter your FIS credentials.
3. From Online Account Administration (OAA), select the SBNLE module from the systems available to your account.
4. After the application verifies your credentials, a brief "Authorizing your session..." screen appears.
5. When authorization succeeds, the Dashboard opens.

Open FDA Industry Systems in a new browser tab to sign in.

> **Account security:** Use your own FIS account or subaccount. Do not share credentials. If another authorized person must file or manage notices, the account holder should create or assign that person a separate subaccount with the required system access.


Authorizing your session...
Please wait while we verify your credentials with the FDA account system.


Access Denied
You are not authorized to access the Small Business Nutrition Labeling Exemption (SBNLE) portal.
Access to this application requires authentication through the FDA FURLS Online Account Administration (OAA) system with the appropriate role assigned to your account.
If you believe you should have access, please contact FDA FURLS support team to request the appropriate role assignment.
Log In via FDA OAA
You will be redirected to the FDA FURLS login page. After logging in, you will be returned to the SBNLE application.
For assistance, contact: furls@fda.gov
Return to FDA Home

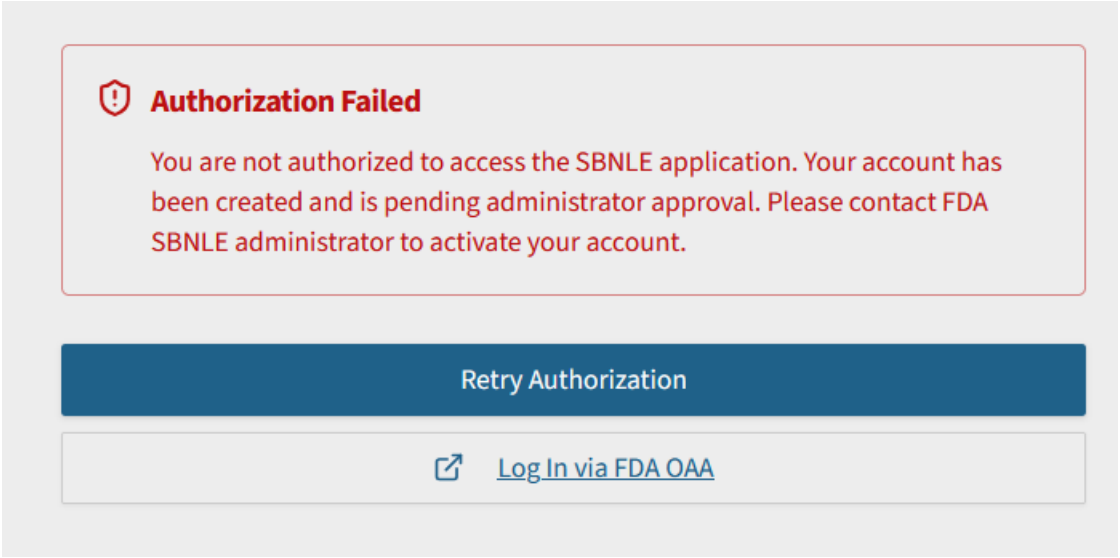


Figure 2. Temporary authorization screen shown after FIS authentication.

If you see "Session Expired," "Access Denied," or "Authorization Failed"

1. **Session Expired:** The one-time sign-in link was already used, timed out, or the previous session ended. Select Log In via FDA OAA, then sign in to FIS again.
2. **Access Denied / Unauthorized:** Your account does not have access to the SBNLE module. Ask the FIS account holder or administrator to update system access, or contact Data Management Support Services (DMSS).
3. **Authorization Failed / account deactivated:** Select Retry Authorization once. If the account remains deactivated, ask the account administrator to reactivate it or contact DMSS.

> **Technical support:** Data Management Support Services (DMSS), FURLS@fda.gov, 1-240-247-8804 or 1-800-216-7331, Monday through Friday, 9:00 a.m. to 6:00 p.m. Eastern Time, excluding federal holidays.

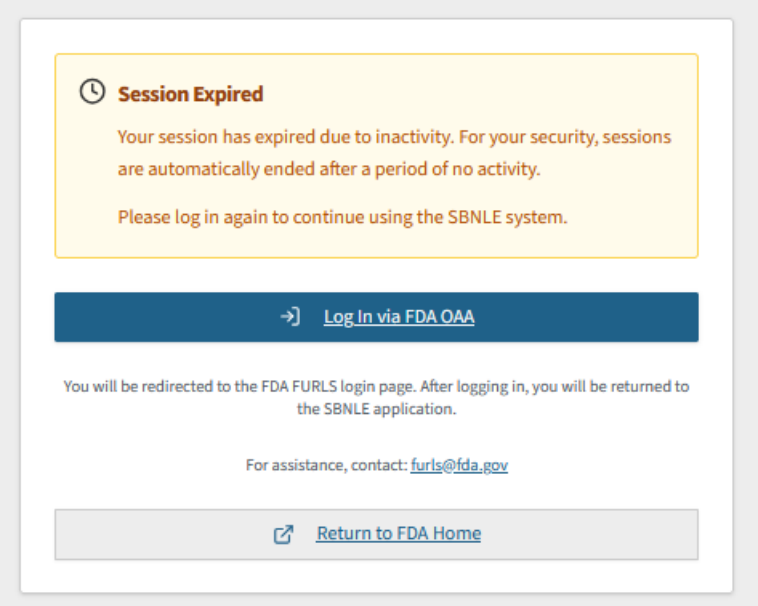


Figure 3. Session Expired message and sign-in options.

Automatic sign-out for inactivity

For security, the application signs you out after 30 minutes of inactivity. Five minutes before sign-out, a Session Timeout Warning dialog displays a countdown. Select Continue Session to remain signed in, or select Sign Out to end the session immediately.

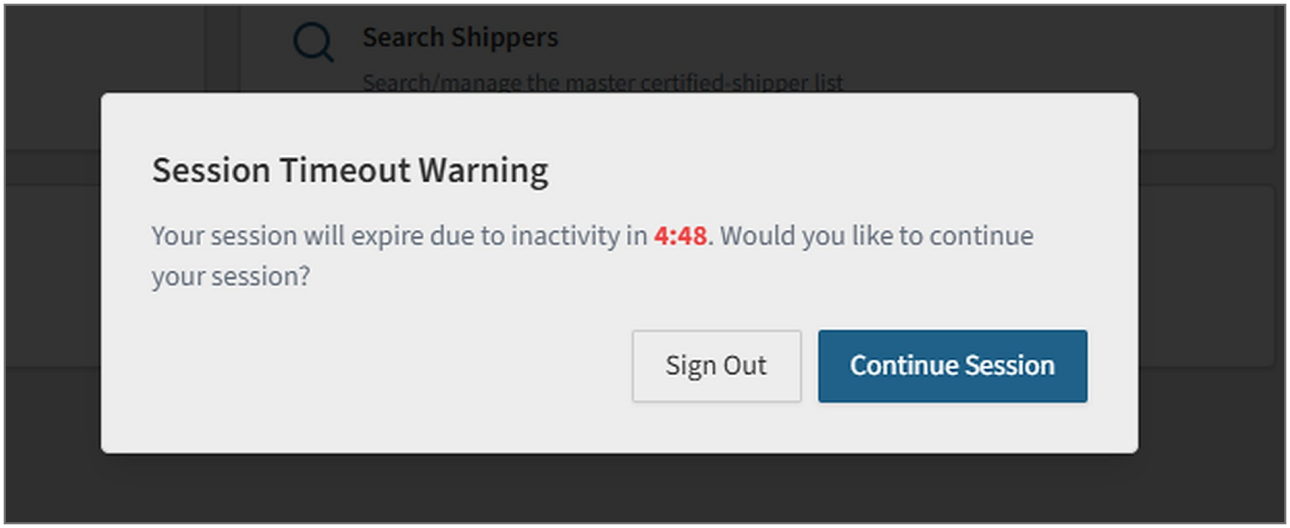


Figure 4. Session Timeout Warning dialog.

Signing out

Select Sign Out in the application header or navigation menu to end the session and return to the FDA Industry Systems home page.

3. The Dashboard

After sign-in, the Dashboard provides a summary of your exemption notices and quick access to common tasks.

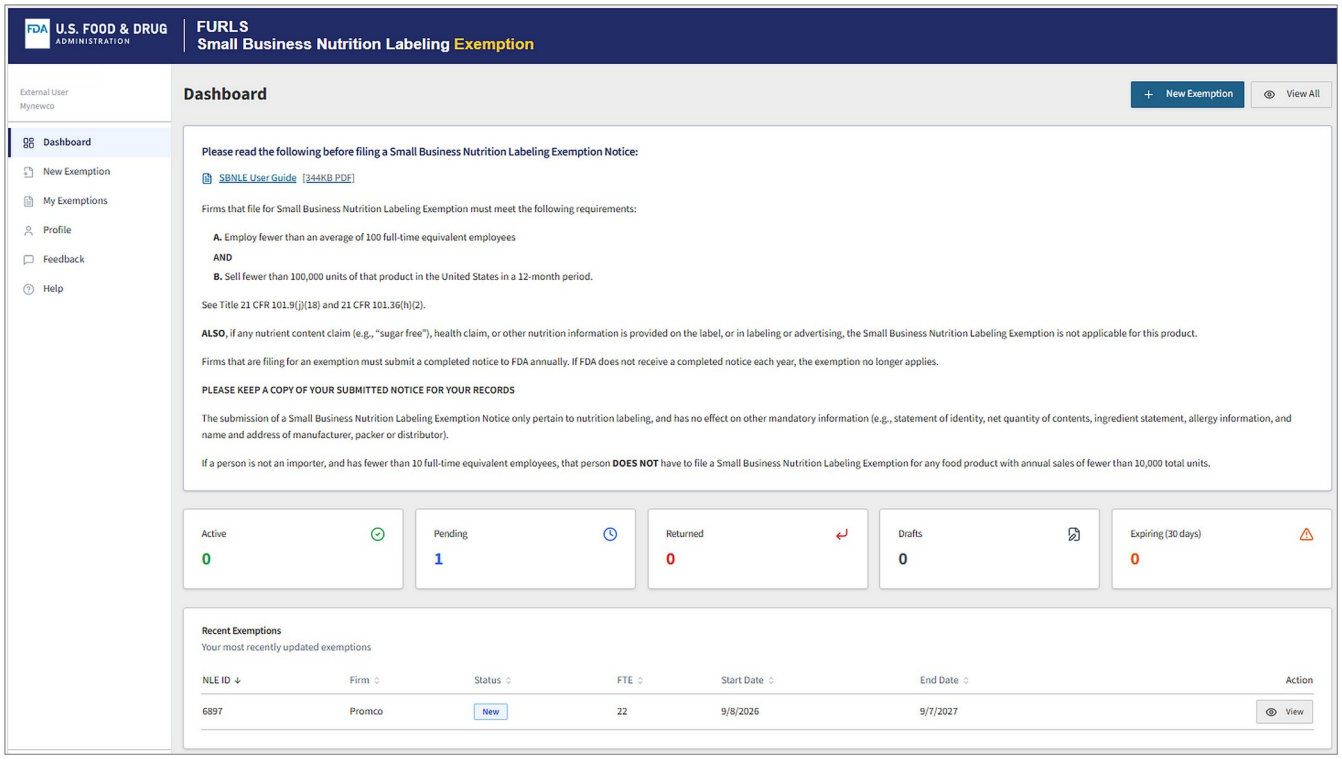


Figure 5. External-filer Dashboard overview.

Actions at the top of the Dashboard

1. **New Exemption:** Starts a new SBNLE Notice.
2. **View All:** Opens My Exemptions.

Summary cards

Card	Meaning
Active	Reviewed notices that are currently in effect.
Pending	Submitted notices awaiting FDA review.
Returned	Notices sent back to you for correction.
Drafts	Notices started but not yet submitted.
Expiring (30 days)	Notices whose exemption period ends within the next 30 days.

Select a summary card to open the corresponding section in My Exemptions. The Recent Exemptions table shows the five submissions updated most recently. Select View for a row to open it. If no submissions exist, the Dashboard provides a Create your first exemption link.

4. My Exemptions

My Exemptions is the complete list of notices associated with your account. Notices are grouped into five sections.

Section	What it contains	Available actions
Drafts	Notices started but not submitted.	Continue, Delete
Pending / New	Submitted, resubmitted, or updated notices awaiting FDA review.	View
Active / Reviewed	Reviewed notices currently in effect.	Update, View, Renew when eligible
Returned	Notices sent back with required corrections.	View, Edit
Expired	Reviewed notices past their end date.	View; Renew if still within the renewal window

Each row shows the NLE ID, firm, status, FTE count, number of products, start date, and end date. Select a column heading to sort; select it again to reverse the order.

> **Definitions:** NLE ID is the system-generated nutrition labeling exemption submission number. FTE means full-time equivalent employee.

If FDA leaves a visible note that you have not opened, a yellow New Note badge appears beside the row actions. Open the notice to read the note. Once an Active / Reviewed notice has been renewed, the earlier notice no longer displays Update; manage the new renewal instead.

5. Submitting a New Exemption Notice

Select New Exemption from the Dashboard or My Exemptions. A new notice uses five steps. At any step, select Save without Submitting to save a draft and return later.

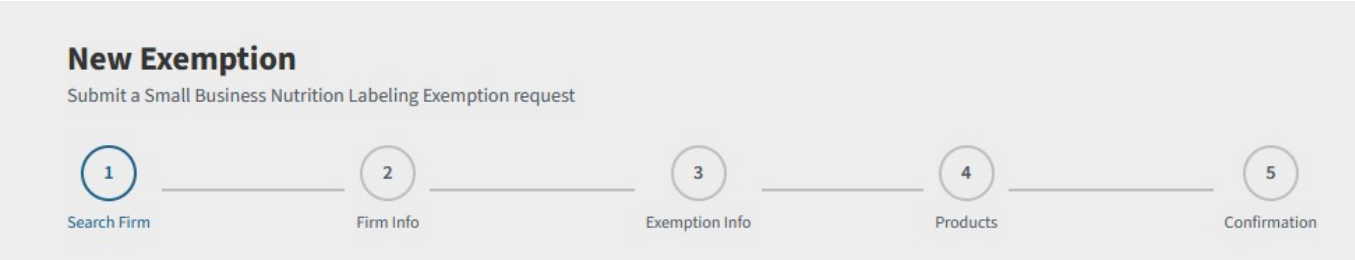


Figure 6. Five-step new-exemption progress indicator.

Step 1: Search for Your Firm

Search for the firm before entering a new record. Selecting an existing record helps FDA match the filing to the correct firm and reduces the information you must enter in Step 2.

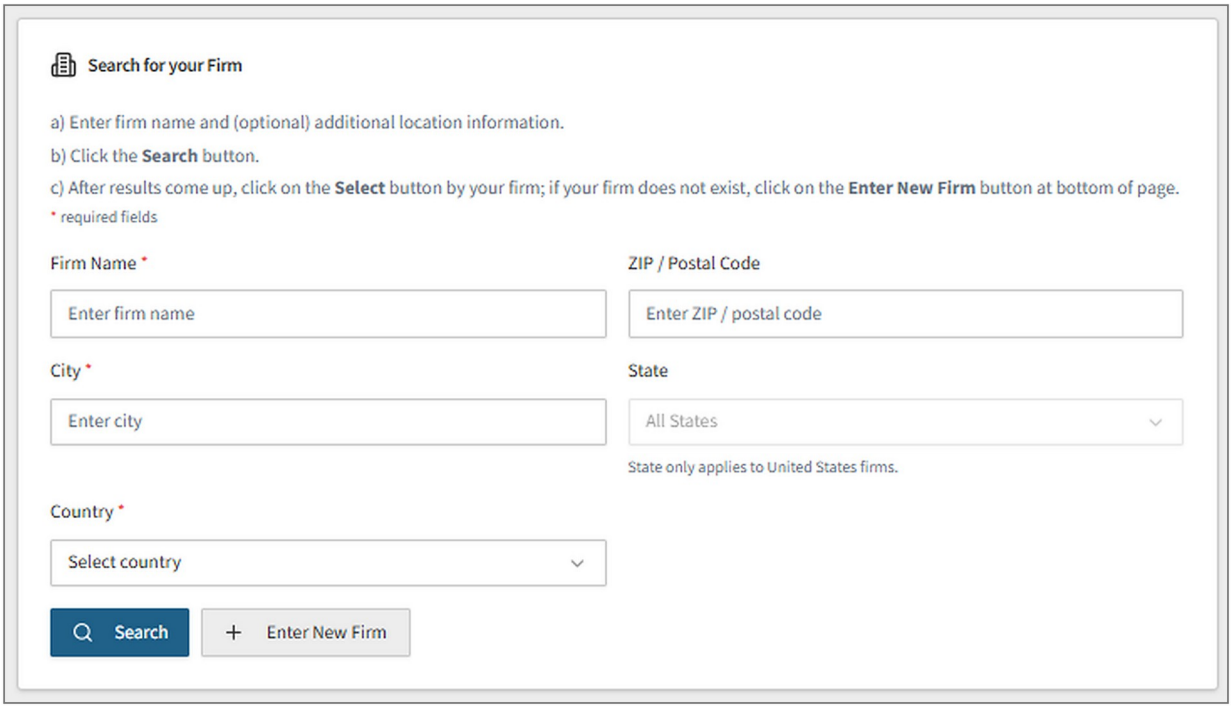


Figure 7. Search for Your Firm form.

1. Enter the Firm Name and City; both are required.
2. Select the Country; this is required.
3. Optionally enter a ZIP or postal code and, for U.S. firms, a State.
4. Select Search.
5. If the correct firm is listed, select Select beside it to continue to Step 2.
6. If the firm is not listed, verify the search terms and search again. If it still does not appear, select Enter New Firm.

> **Search tip:** Search using the firm name and city as they appear in FDA records. The available source materials do not specify a wildcard character; do not depend on a percent sign or another wildcard unless the application itself provides that instruction.

For returning filers, a Firms You've Already Submitted table may appear above the search results. Those firms do not appear again in the regular search results.

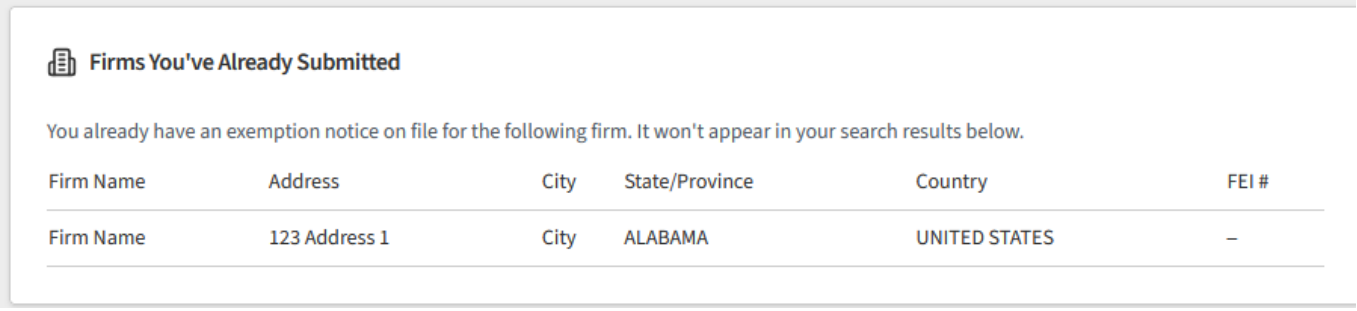


Figure 8. Previously submitted firms table.

When you select Enter New Firm, a confirmation dialog reminds you to verify that the firm is not already listed. Select Yes to continue. The firm name and location information from your search carry forward to Step 2.

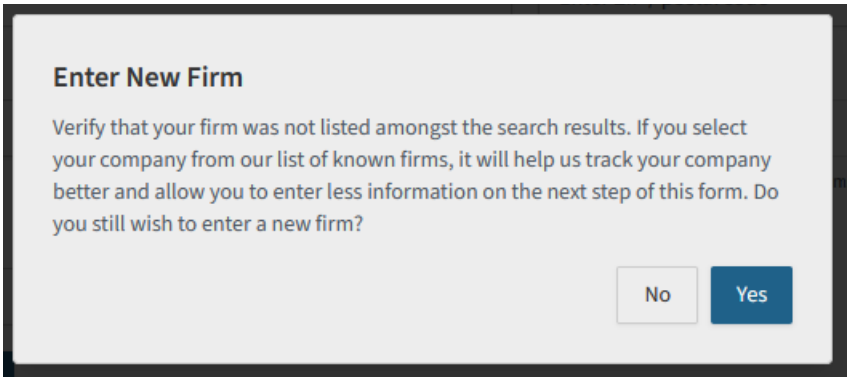


Figure 9. Enter New Firm confirmation dialog.

Step 2: Firm Information

Complete the firm, address, authorized filer, and contact information. Required fields are marked in the application.

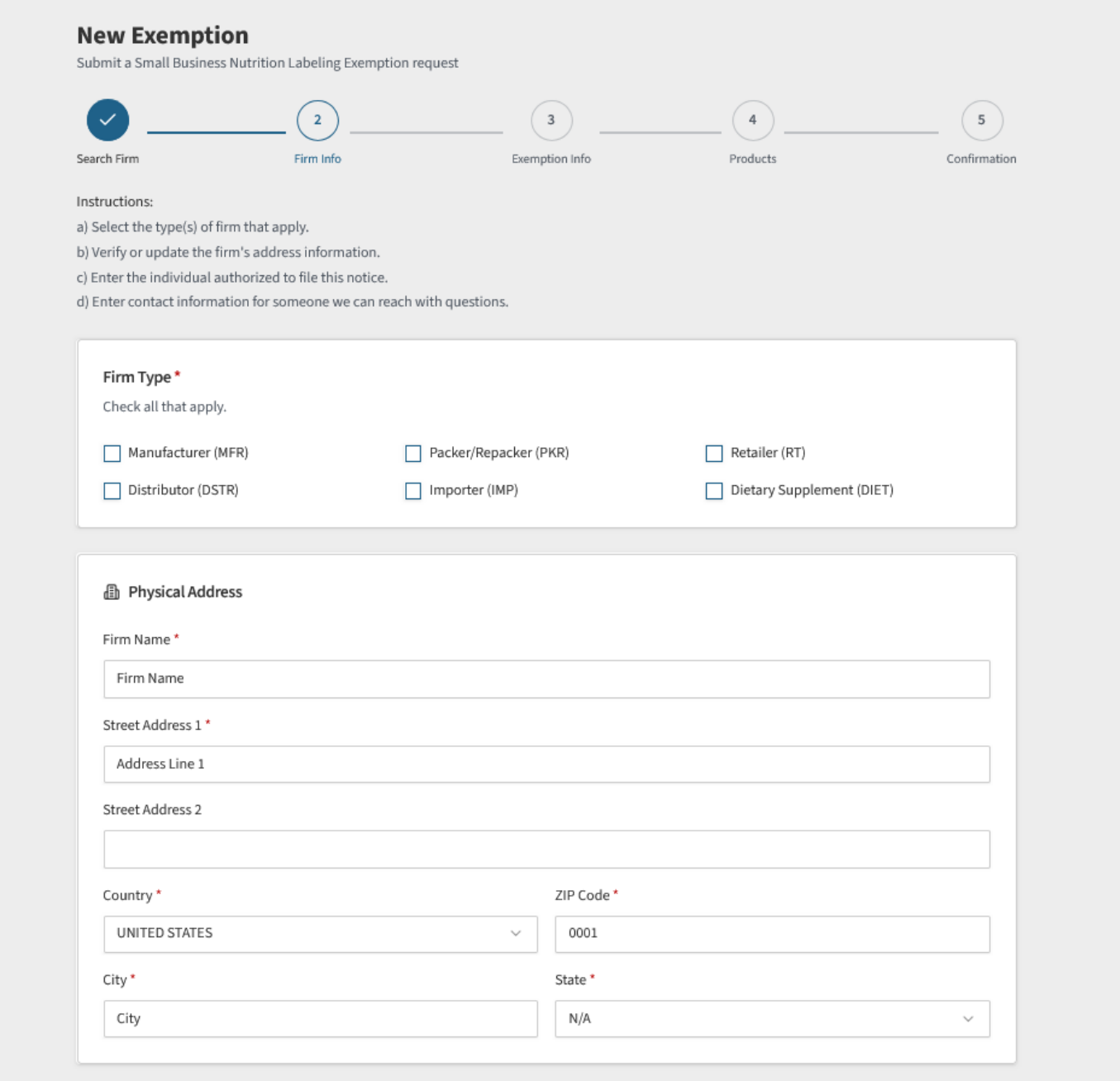


Figure 10. Firm Information form: firm type and physical address.

1. **Type of Firm:** Select every role that applies: Manufacturer, Packer/Repacker, Retailer, Distributor, Importer, or Dietary Supplement. Select at least one role. Dietary Supplement alone is not sufficient; select another applicable role as well.
2. **Physical Address:** Enter the firm's actual location, not a post office box. U.S. firms must provide a ZIP code and state. Firms outside the United States may provide a province and postal code.
3. **Phone / Fax:** Enter the required phone area code and number. Use the U.S. format shown by the application; enter international numbers as digits only. Fax is optional unless the screen identifies it as required.

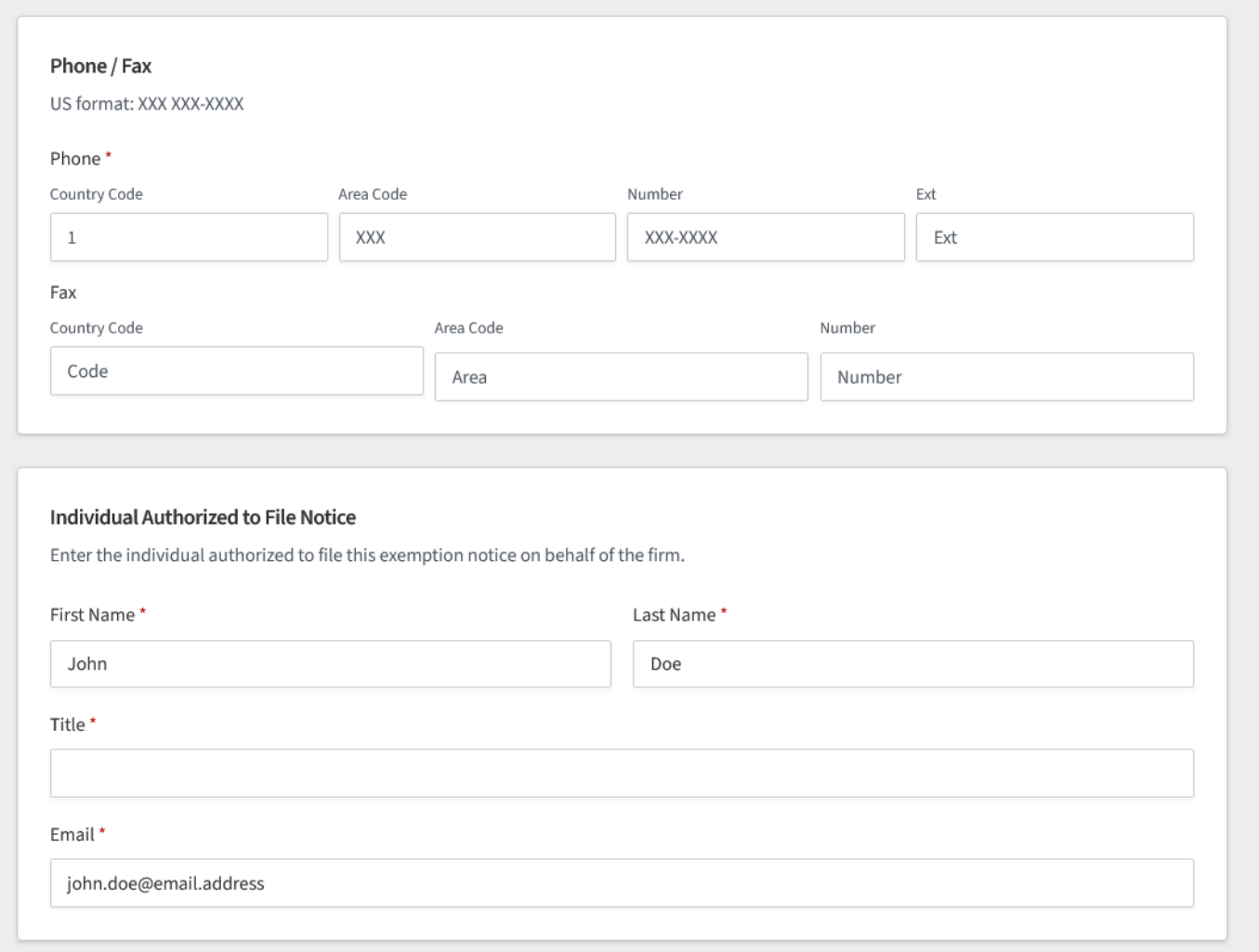


Figure 11. Firm Information form: phone and authorized filer.

4. **Individual Authorized to File Notice:** Confirm the first name, last name, title, and email of the responsible individual certifying the filing. Values may be prefilled from the signed-in account. Correct the displayed contact information when needed, but do not share login credentials.
5. **Mailing Address:** Leave Same as physical address selected when the addresses match. Clear the selection to enter a different mailing address.
6. **Contact Person:** Leave Same as individual authorized to file notice selected when that person should receive questions. Clear it and complete the required contact fields when someone else should be contacted.

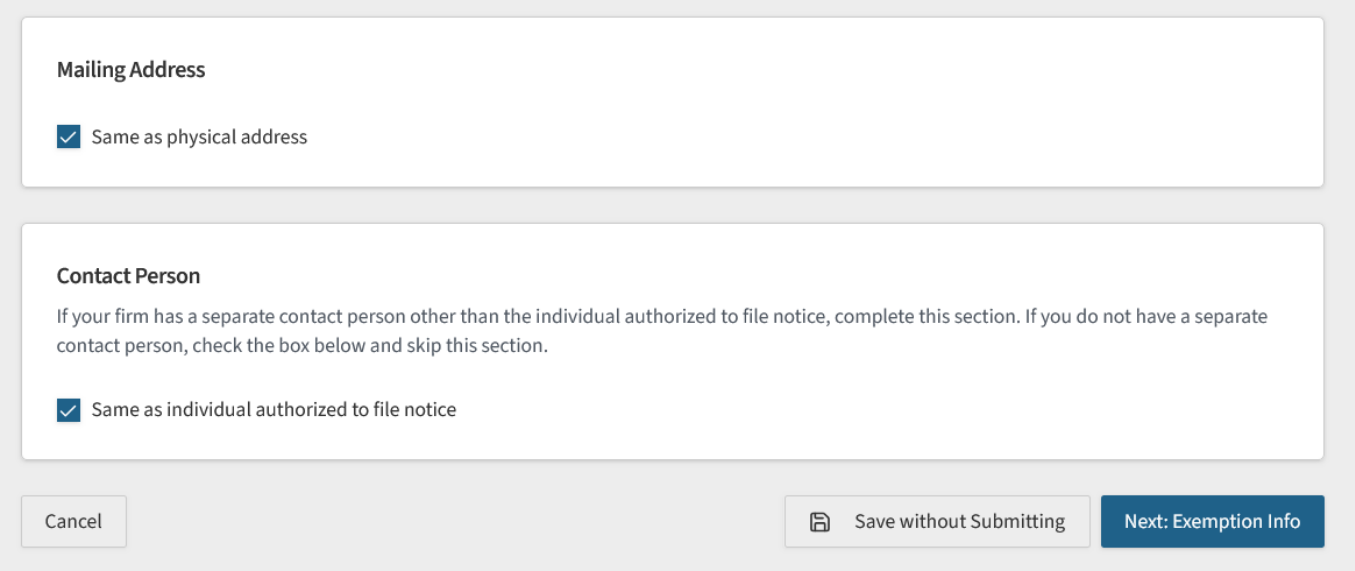


Figure 12. Firm Information form: mailing address and contact person.

> **Returned notices:** If FDA returned the notice, a Notes from Administrator card appears at the top of this step. Read the note before making corrections.

Select Next: Exemption Info to continue, or select Save without Submitting to keep a draft.

Step 3: Exemption Information

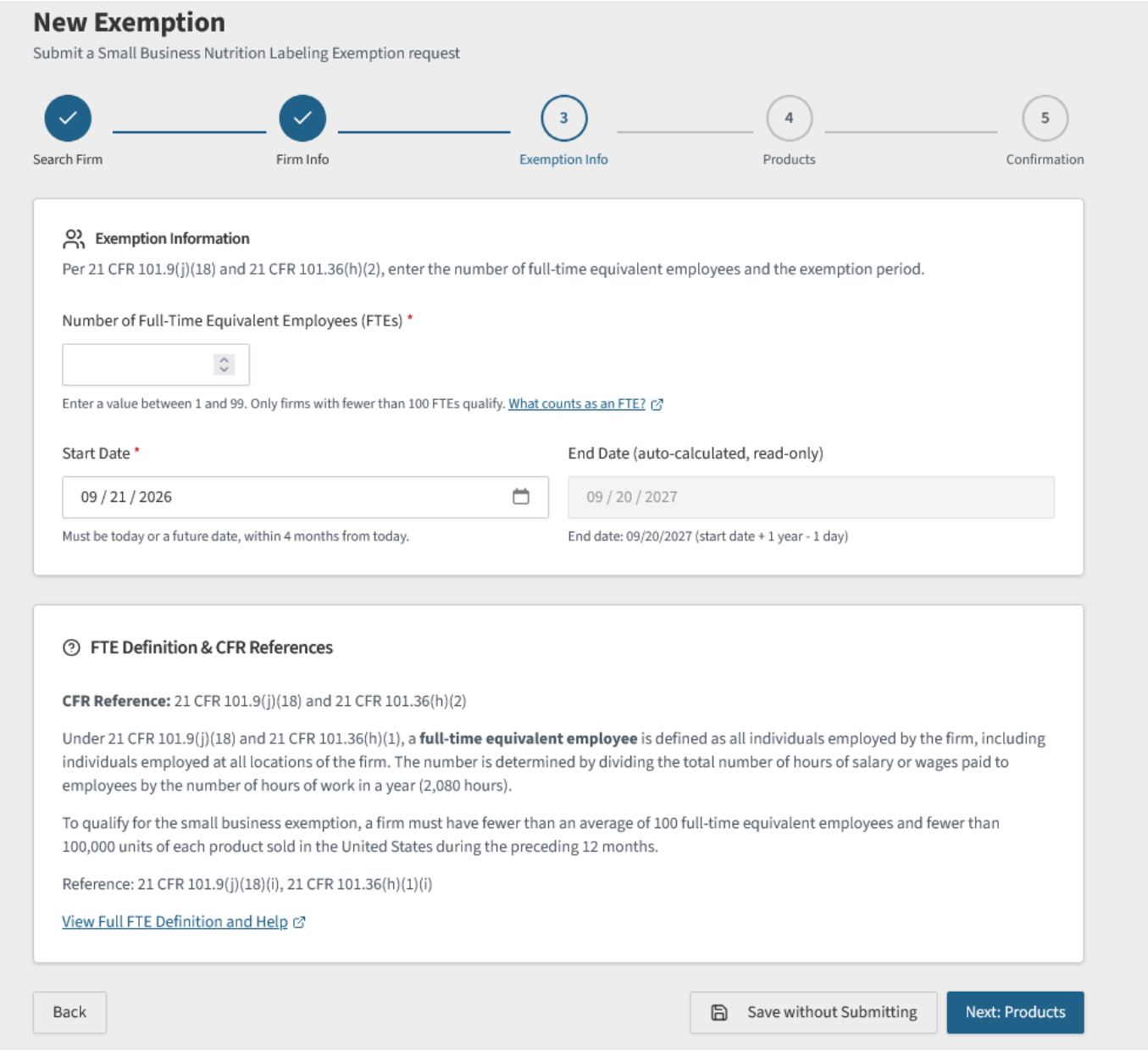


Figure 13. Exemption Information step.

1. **Number of Full-Time Equivalent Employees (FTEs):** Enter a whole number from 1 through 99. Include employees of the firm and all affiliates over the previous 12 months, including owners. For a new business, estimate the upcoming year.
2. **Start Date:** Enter today's date or a date no more than four months in the future.
3. **End Date:** The application calculates a date one year minus one day after the start date. You cannot edit it directly.
4. **Select Next: Products.**

> **Updating a Reviewed notice:** The original Start Date is locked and cannot be changed during an update.

Step 4: Products

List every product included in the notice. Add any separate manufacturers, distributors, or importers before adding the products associated with them.

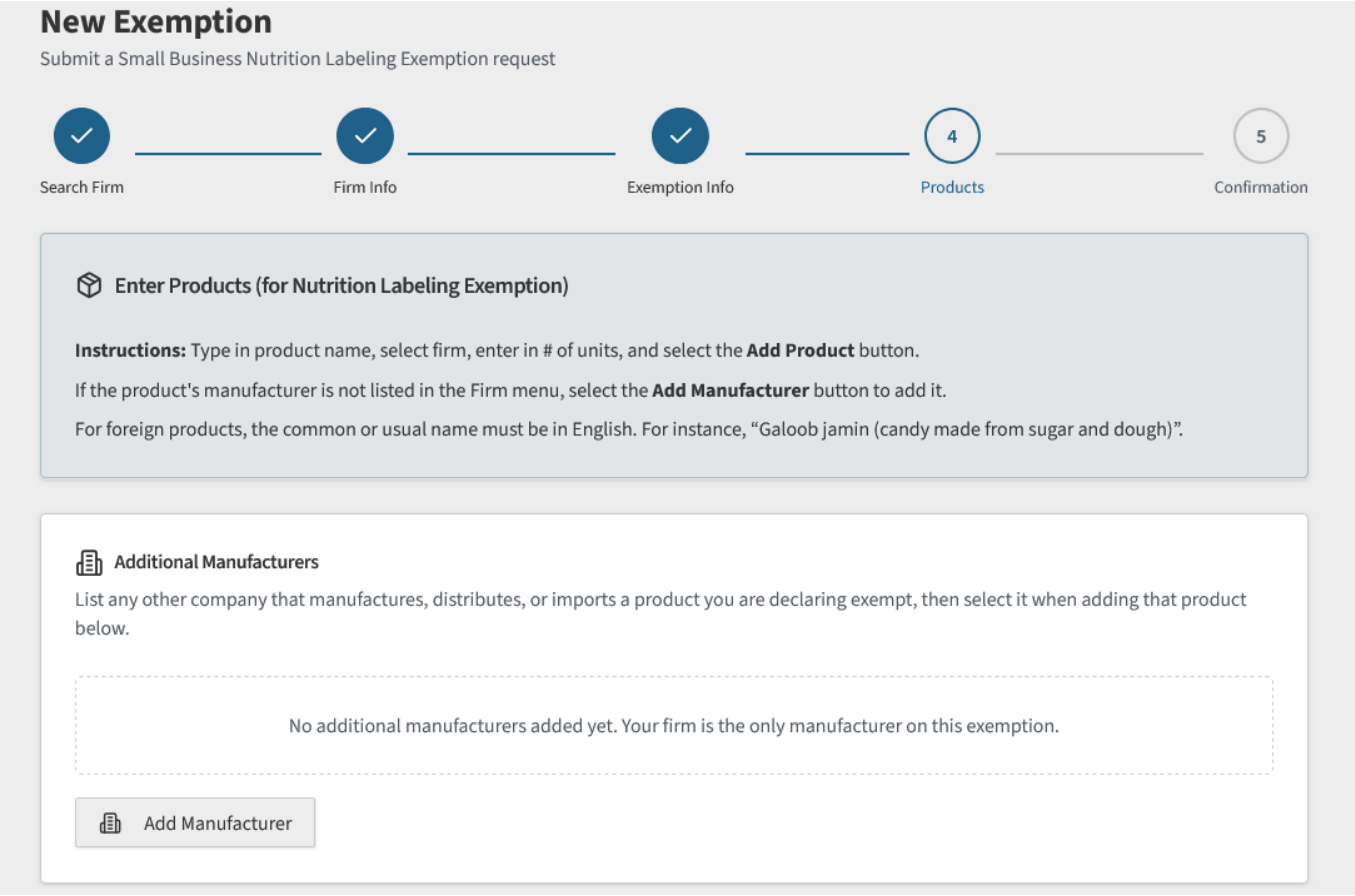


Figure 14. Products step: instructions and additional manufacturers.

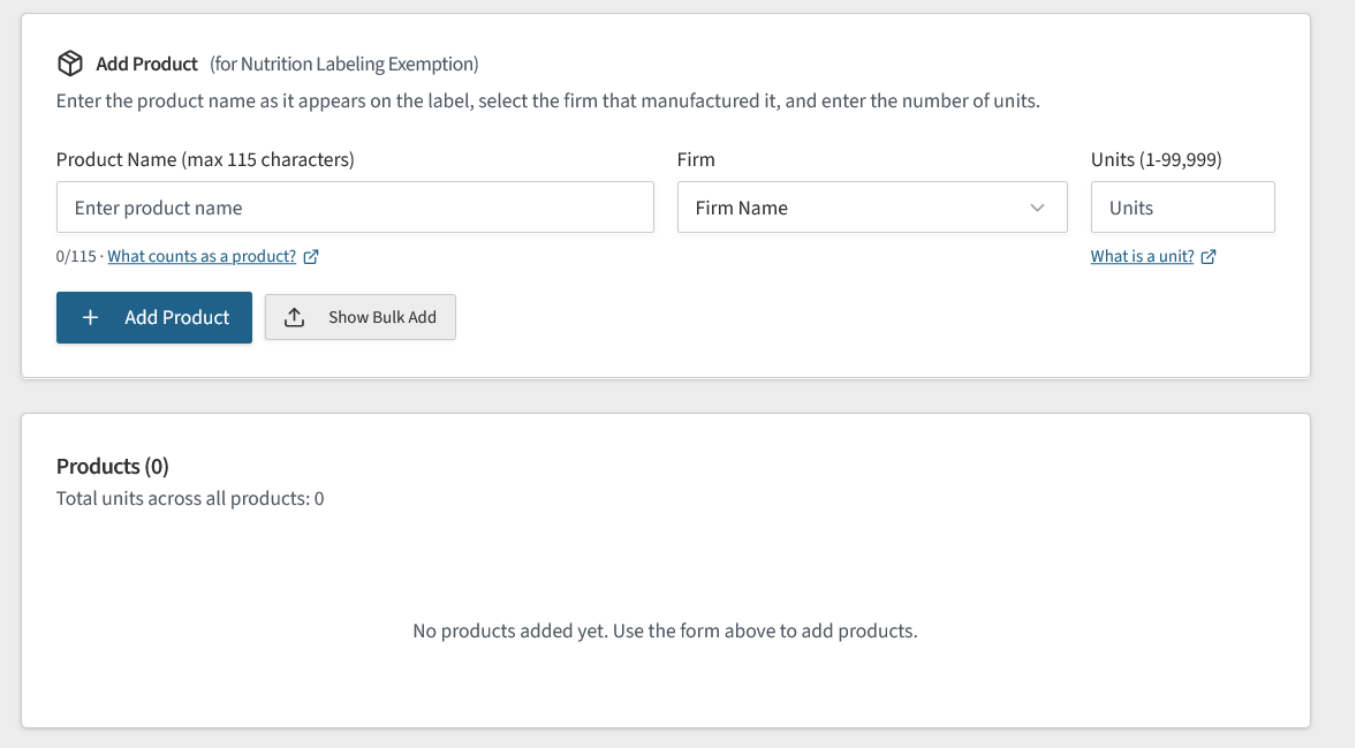


Figure 15. Products step: add-product form and product list.

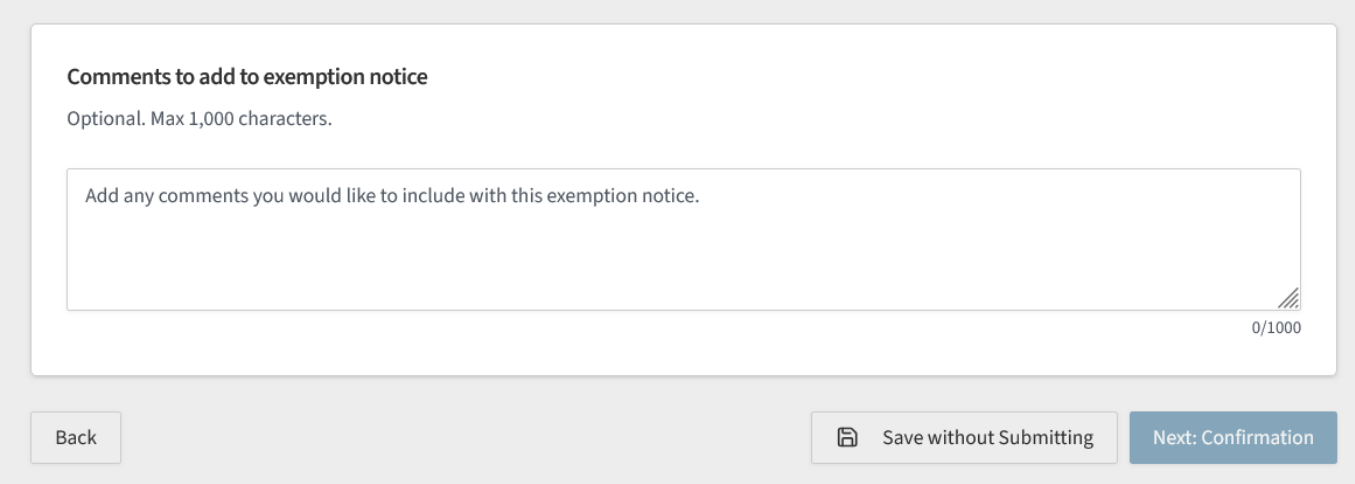


Figure 16. Products step: comments and navigation.

Additional manufacturers

If another company manufactures, distributes, or imports a product, select Add Manufacturer and search for that company as you searched for the filing firm. If the company is not found, enter it as a new firm and identify its applicable role or roles.

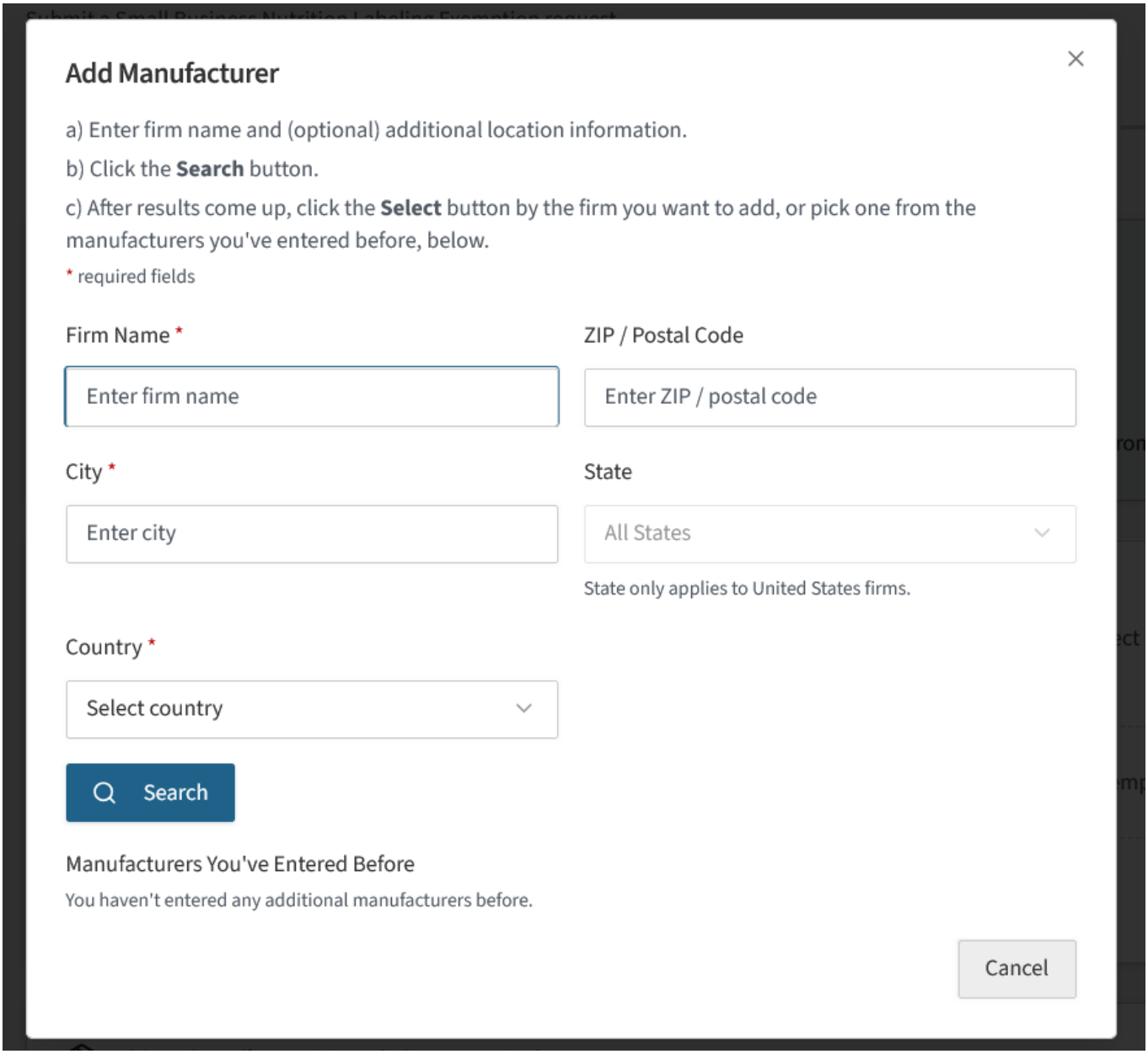


Figure 17. Add Manufacturer search dialog.

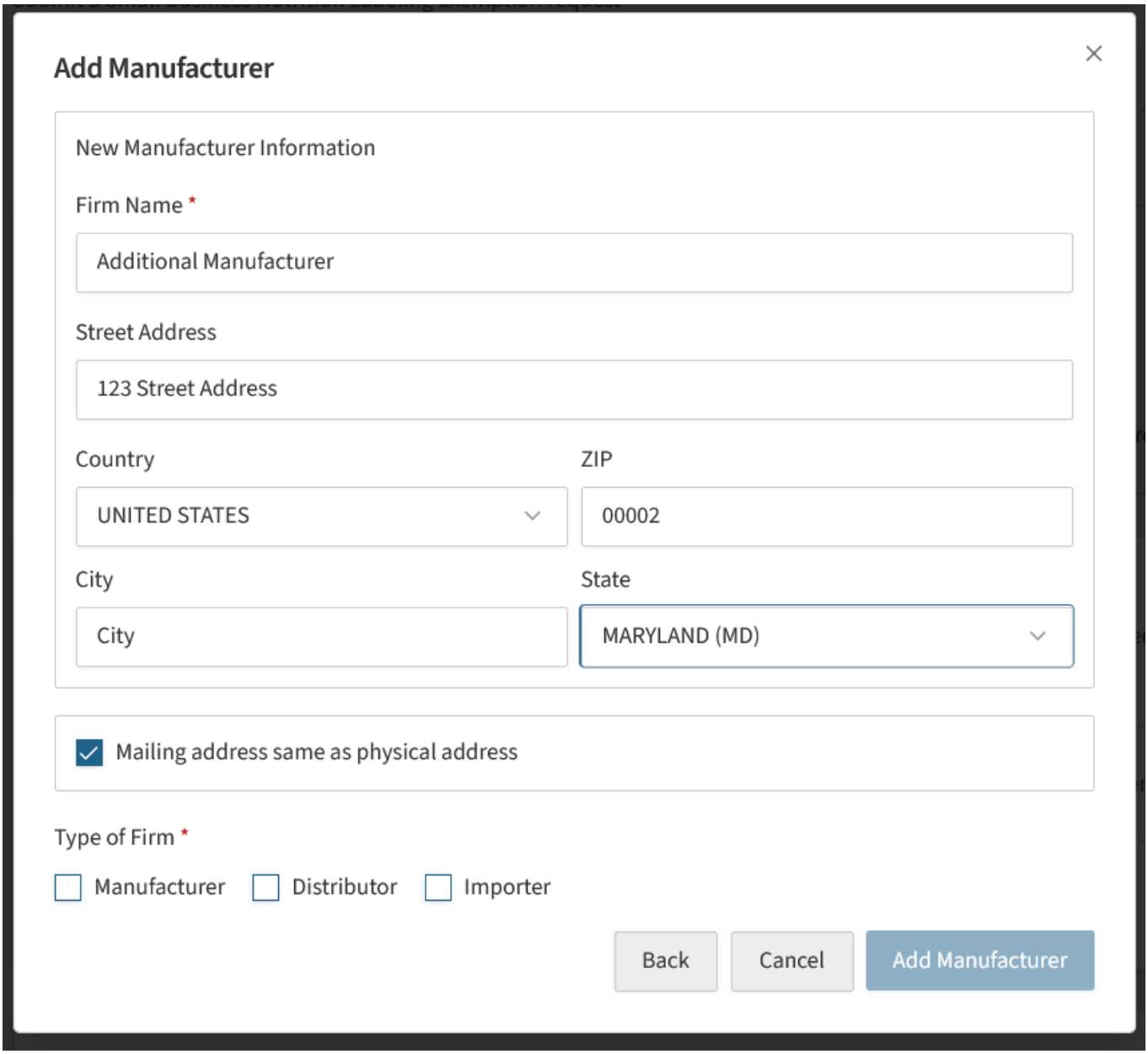


Figure 18. Additional manufacturer details and role selection.

Add a product

1. **Product Name:** Enter the name as it appears on the label, including the brand, up to 115 characters. A product covers all package sizes from one manufacturer that use the same brand name, statement of identity, and preparation method. For a foreign-language name, add a plain-English description in parentheses.
2. **Firm:** Select the firm that manufactured the product: your firm or an additional manufacturer.
3. **Number of Units:** Enter the approximate total units sold in the United States in the previous 12 months. For a new product, enter the estimate for the coming 12 months. The value must be a whole number from 1 through 99,999.
4. **Select Add Product.**

Bulk Add

For a long list, select the firm and paste one product-name and unit pair per line in the Bulk Add box. Separate the product name and unit count with a space or tab, as shown on the screen. Review the parsed list before adding it.

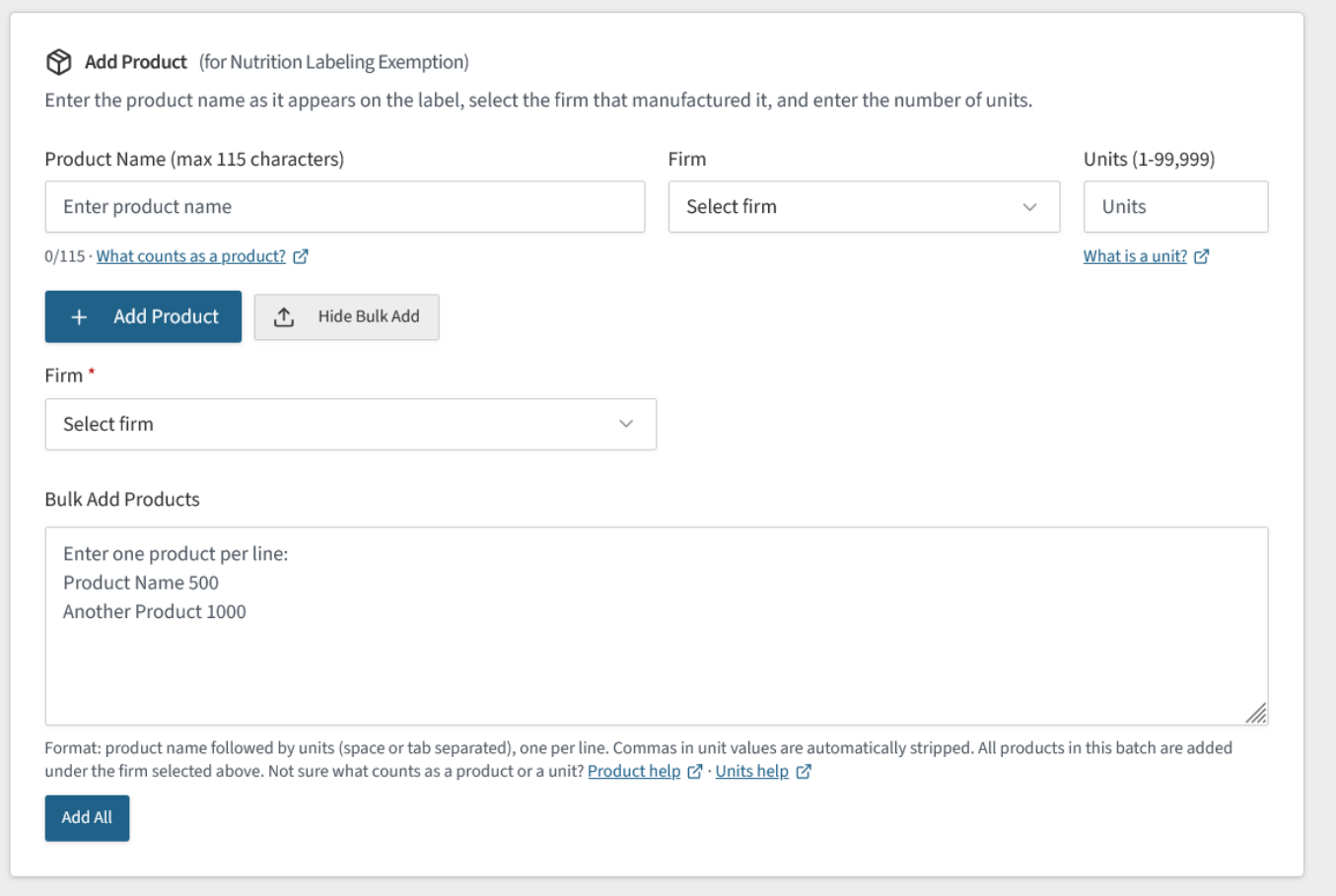


Figure 19. Expanded Bulk Add panel.

Edit, delete, and review products

Use the Edit or Delete action beside a row to change or remove a product.

5. **Total units:** The total for a product must remain below 100,000 during the 12-month exemption period. When the application treats matching product entries as the same product, it groups them and totals the units.
6. **Watchwords:** Certain words in a product name may indicate nutrition information, a nutrient content claim, or a health claim. The application displays a persistent Nutrition Labeling Notice for flagged products. You may continue, but FDA may give the product additional review.
7. **Maximum products:** A submission may contain up to 250 products.
8. **Comments:** You may add an optional comment of up to 1,000 characters for FDA.

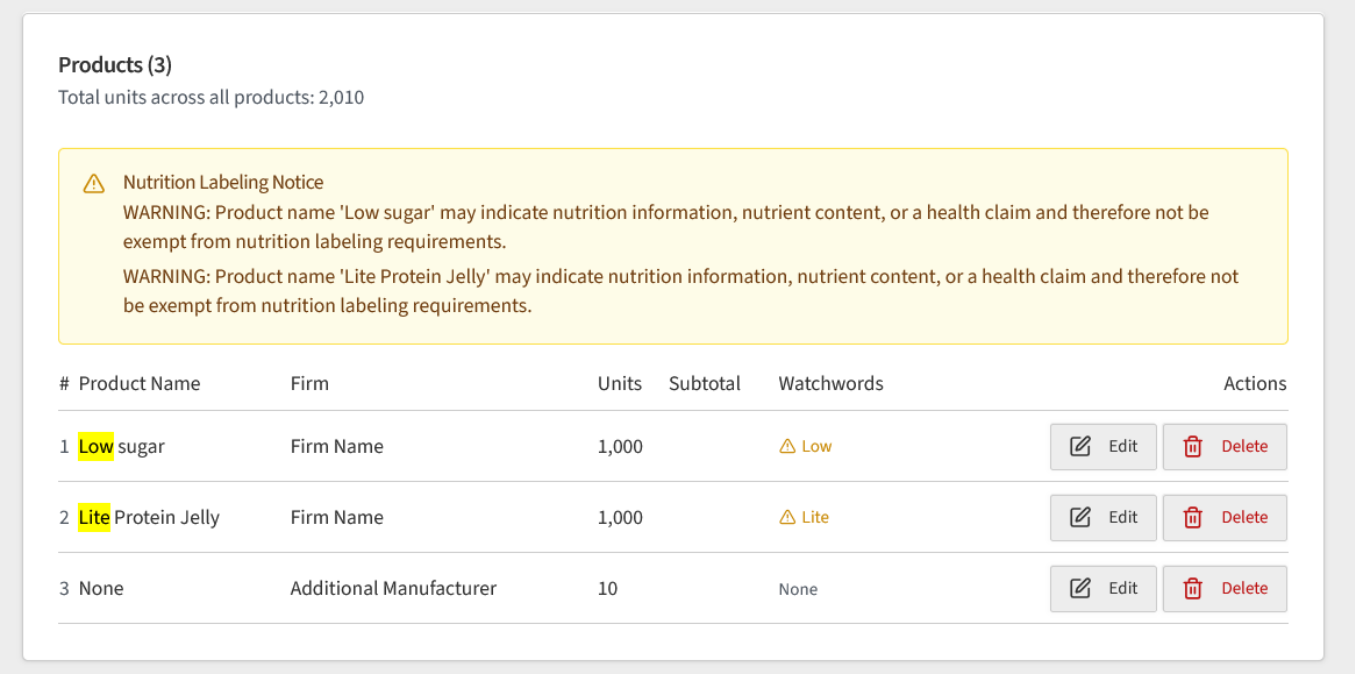


Figure 20. Nutrition Labeling Notice for a flagged product name.

When the product list is complete, select Next: Confirmation.

Step 5: Confirmation

Review the read-only summary before submitting. The page displays firm information, exemption information, your comment, visible notes or memos, additional manufacturers, and products grouped by manufacturer with unit totals.

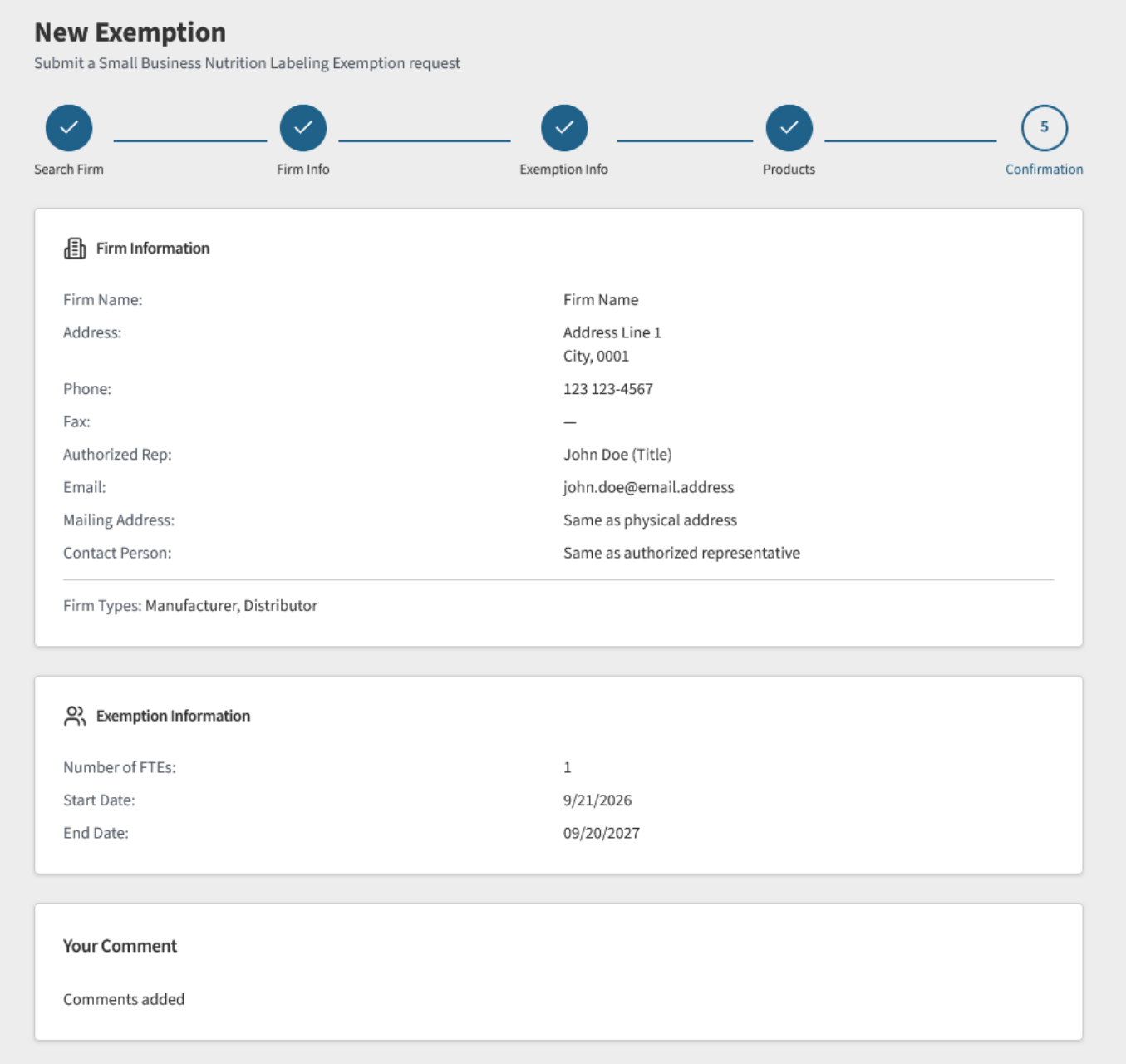


Figure 21. Confirmation page: firm, exemption, and comment summary.

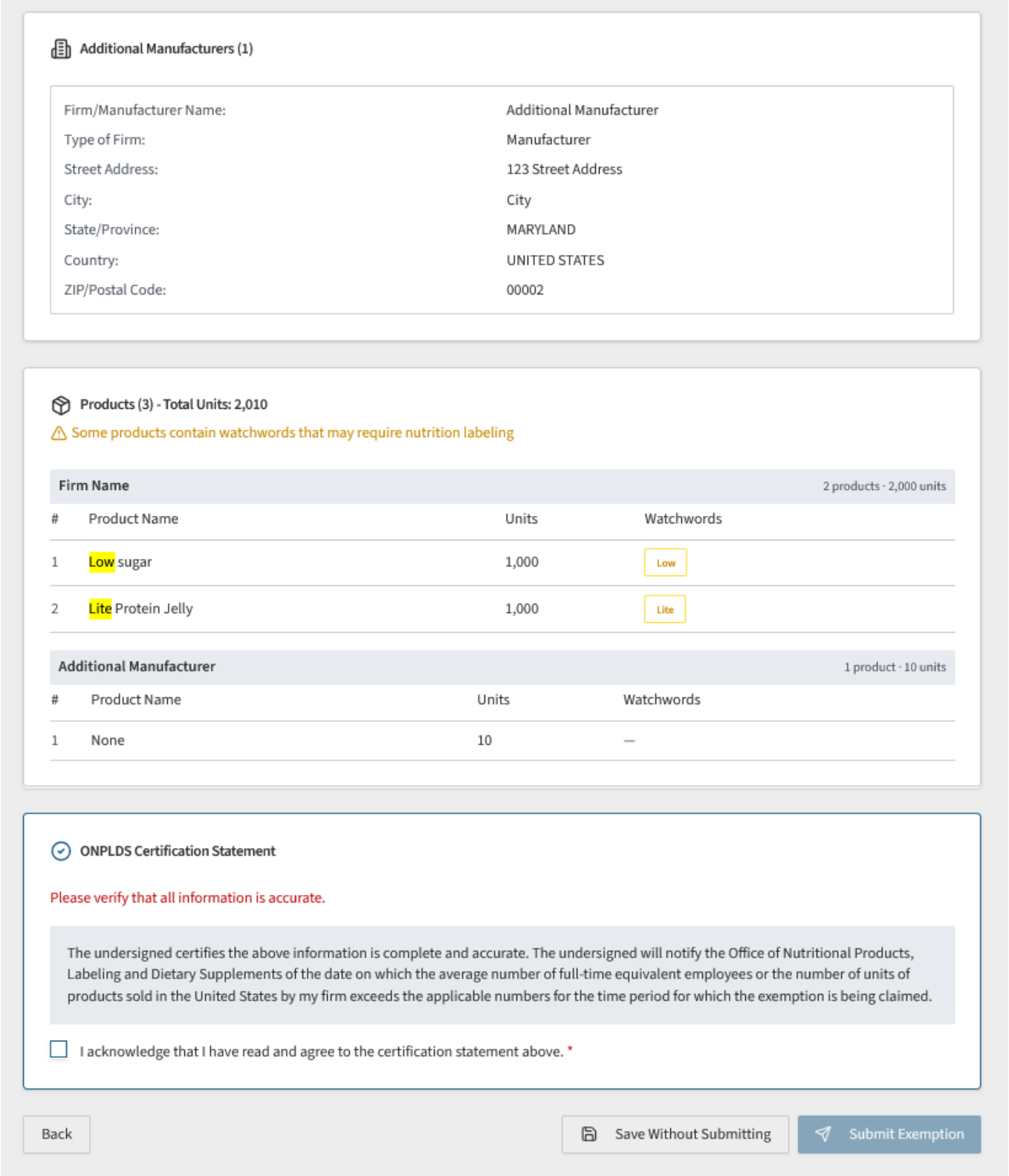


Figure 22. Confirmation page: manufacturers, products, and certification.

Read the certification statement carefully:

> The undersigned certifies the above information is complete and accurate. The undersigned will notify the Office of Nutritional Products, Labeling and Dietary Supplements of the date on which the average number of full-time equivalent employees or the number of units of products sold in the United States

> by my firm exceeds the applicable numbers for the time period for which the exemption is being claimed.

Select the checkbox acknowledging that you have read and agree to the certification statement. The Submit button remains unavailable until the checkbox is selected.

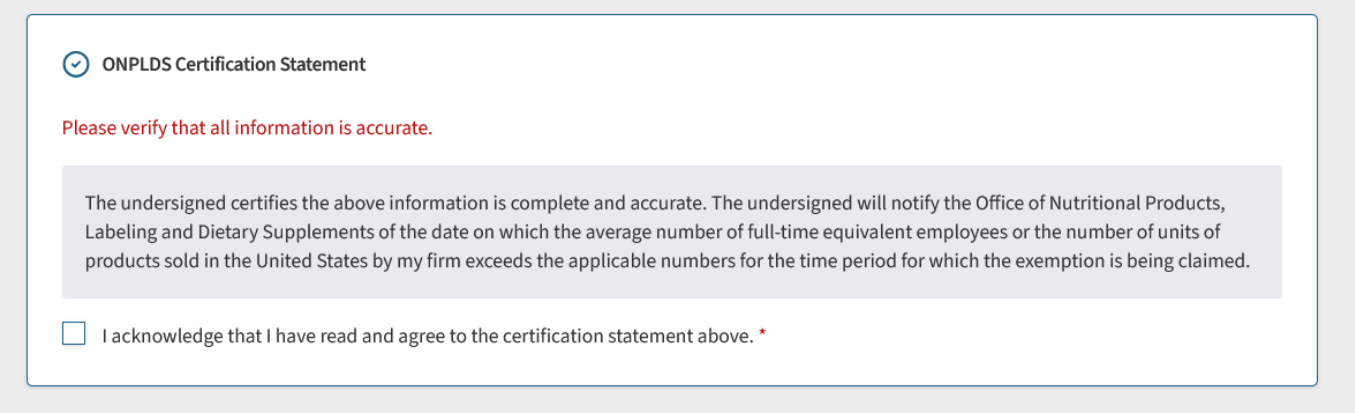


Figure 23. Certification acknowledgment and submission controls.

To correct information, select Back or select an earlier step in the progress indicator. When the information is correct, select Submit Exemption. During an update, the button is labeled Submit Update; when correcting a Returned notice, it is labeled Resubmit Exemption.

6. After You Submit

After submission, the application displays a confirmation page stating that the notice was successfully submitted to FDA for review.

> Any firm claiming a nutrition labeling exemption must submit a completed notice to FDA annually. If FDA does not receive a completed notice each year, the exemption no longer applies. FDA does not notify firms when it is time to file a notice. Please keep a record of your submission.

Disclaimer: Receipt of the submission does not mean that FDA has accepted the notice. FDA may contact you by email to request additional information.

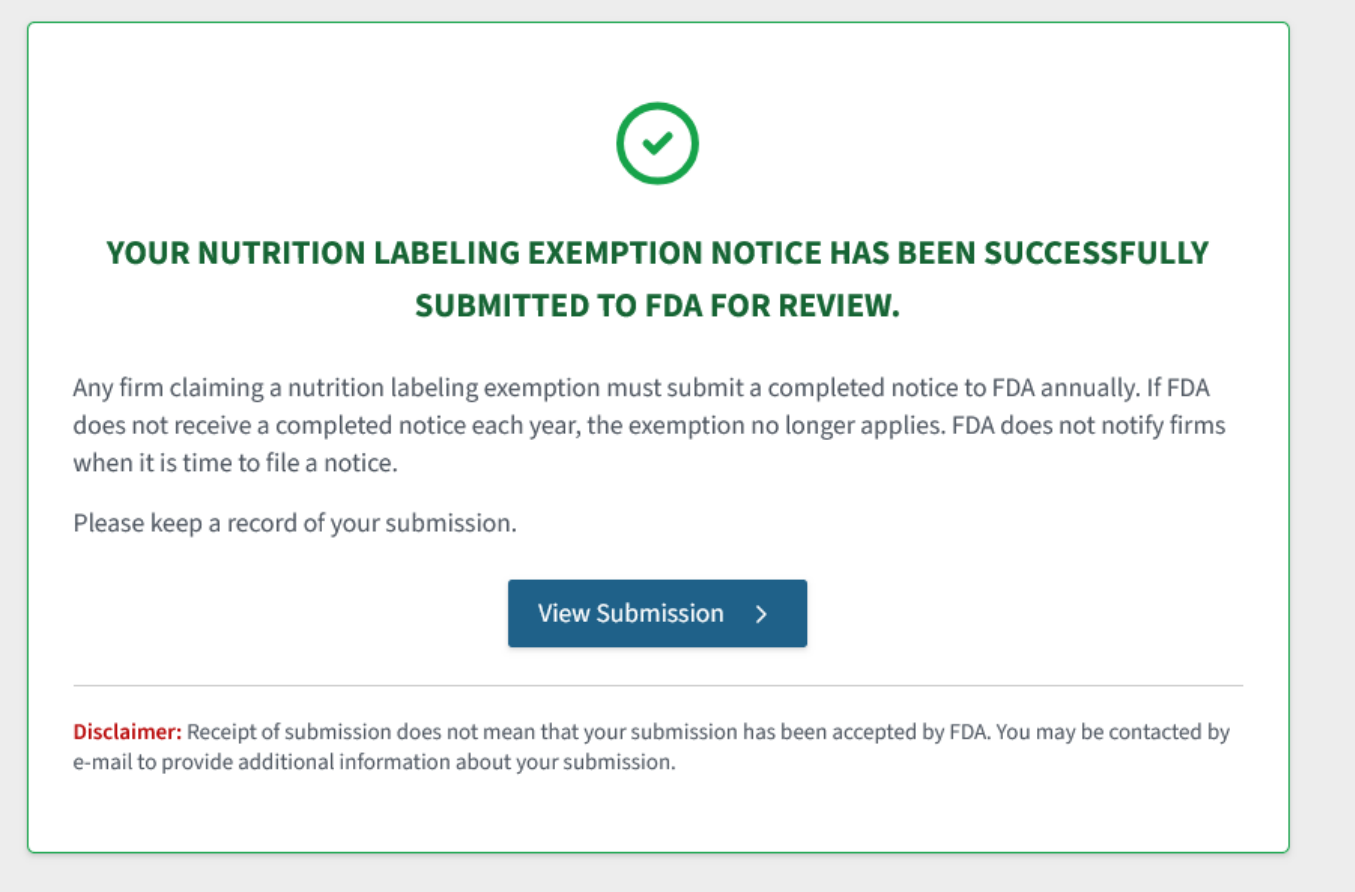


Figure 24. Successful-submission confirmation page.

Select View Submission to open the exemption detail page.

7. Viewing an Exemption Notice

Select View beside any notice in My Exemptions, or select View Submission immediately after filing, to open the read-only detail page.

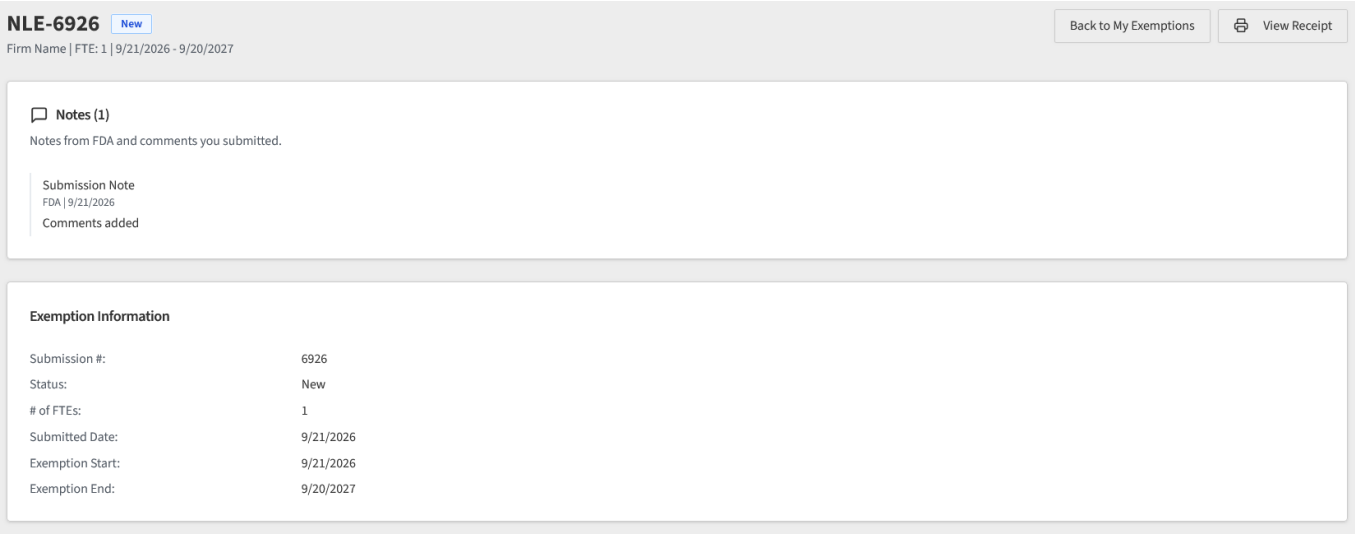


Figure 25. Exemption detail page: header and exemption information.

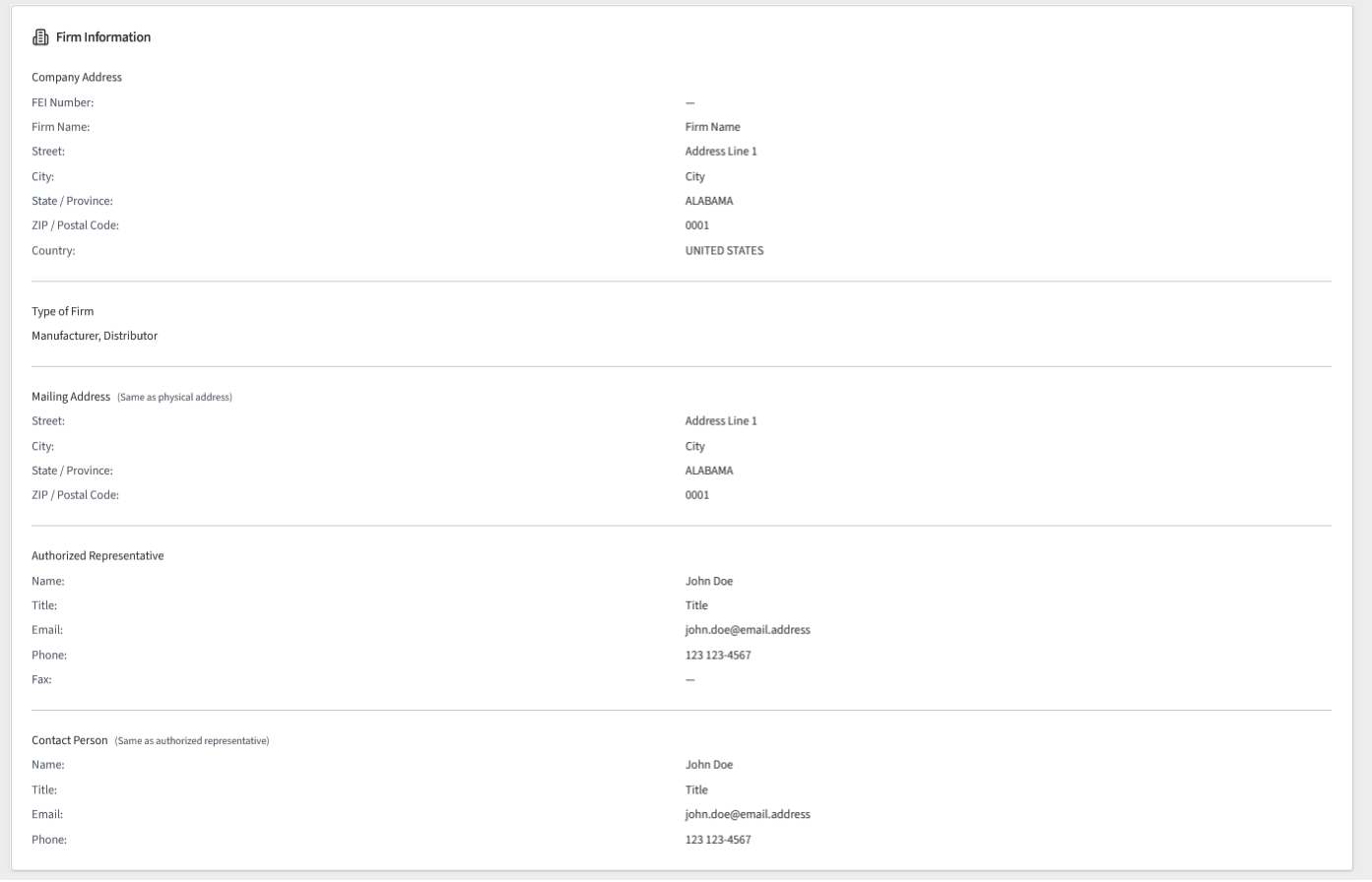


Figure 26. Exemption detail page: firm and contact information.

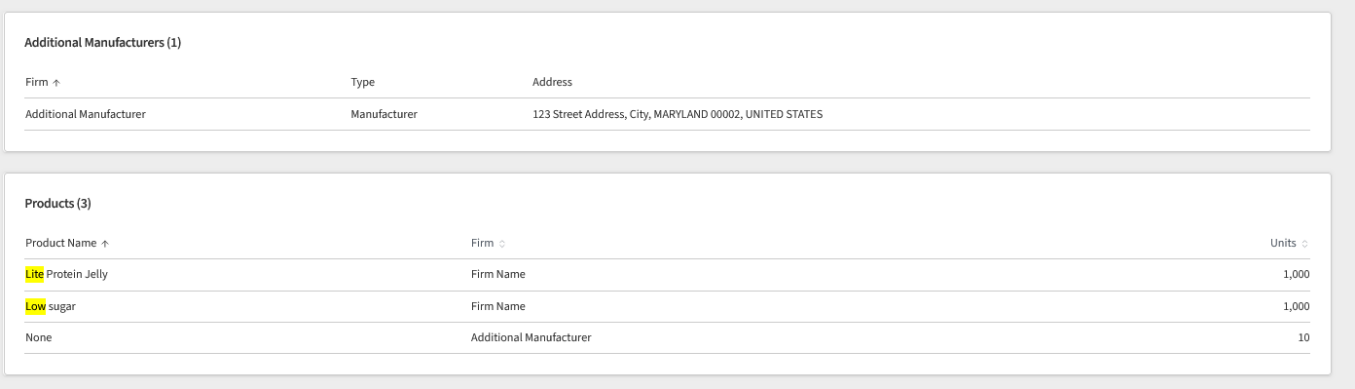


Figure 27. Exemption detail page: manufacturers and products.

The page includes:

1. **Header:** NLE ID, current status, firm name, FTE count, and exemption dates. Parent and Renewed links appear when the notice is connected to another submission.
2. **Action buttons:** Back to My Exemptions, Renew when eligible, and View Receipt.
3. **Return reasons:** Specific correction reasons when FDA returned the notice.
4. **Notes:** Visible notes from FDA and comments that you submitted.
5. **Read-only details:** Exemption Information, Firm Information, Additional Manufacturers, and Products.

> **Internal FDA documents:** Documents used internally by FDA are not displayed on the external filer detail page.

8. Notes and Messages from FDA

FDA staff may add a note to explain a return, ask a question, or provide guidance. A note marked visible to the external filer may appear in the following locations:

1. The Notes card on the exemption detail page.
2. A Notes from Administrator card at the top of Step 2 when you continue or correct a Returned notice.
3. A New Note badge in My Exemptions until you open the notice.

Comments you submitted through the wizard also appear in the Notes area and are identified as coming from You.

9. Renewing an Exemption Notice

An exemption notice covers a 12-month period. A Renew action appears when a Reviewed notice is within 30 days before its end date or within 30 days after the end date. Renewal is available only while the notice remains Reviewed and has not already been renewed.

A renewal is prefilled from the previous notice and uses the following order:

1. **Exemption Information:** Confirm the FTE count and enter the new Start Date.
2. **Firm Information:** Review the prefilled details. The firm name cannot be changed during renewal.
3. **Manufacturers:** Review the carried-forward manufacturers, distributors, or importers. Add or remove records as needed. Removing a manufacturer also removes its products from the renewal.
4. **Products:** Review all carried-forward products. Add, edit, or remove products, and use Update Units to enter the actual units for the prior period and any date a product exceeded 100,000 units when applicable.
5. **Confirmation:** Review and certify the renewal, then select Submit Exemption.

> **After renewal:** Manage the new renewal as the current notice. The earlier notice remains available to view but no longer offers Update.

10. Printing Your Receipt

From the exemption detail page, select View Receipt to open a printable summary for your records. The receipt includes firm and authorized-filer information, exemption dates, products, the certification, and the submission disclaimer.



U.S. FOOD & DRUG ADMINISTRATION

Small Business Nutrition Labeling Exemption

Office of Nutritional Products, Labeling, and Dietary Supplements

Exemption Notice Receipt

Submission #: 6926
Status: New
Submitted: 9/21/2026

Firm Information

Firm Name	Firm Name
Address	Address Line 1 City, 0001
Firm Type	Manufacturer, Distributor

Individual Authorized to File Notice

Name	John Doe, Title
Phone	123 123-4567
Email	john.doe@email.address

Exemption Information

Full-time equivalent employees	1
Exemption period	9/20/2026 – 9/19/2027

Products (3)

Name of Product	Firm	# of Units
Low sugar	Firm Name	1,000
Lite Protein Jelly	Firm Name	1,000
None	Additional Manufacturer	10

The undersigned certifies the above information is complete and accurate. The undersigned will notify the Office of Nutritional Products, Labeling and Dietary Supplements of the date on which the average number of full-time equivalent employees or the number of units of products sold in the United States by my firm exceeds the applicable numbers for the time period for which the exemption is being claimed.

Disclaimer: Receipt of submission does not mean that your submission has been accepted by FDA. You may be contacted to provide additional information about your submission.

Figure 28. Printable exemption-notice receipt.

Select Print / Save as PDF to print the receipt or save an electronic copy. Retain a copy of every submitted notice.

11. Updating a Reviewed Exemption

To correct or add information to a currently Reviewed notice before renewal, select Update in My Exemptions. The application opens the same five-step workflow used for a new submission and prefills the current information.

1. The original Start Date is locked and cannot be changed.
2. Review every step because the submitted update replaces the current information.
3. On the final step, select Submit Update.

After a notice has been renewed, the earlier notice no longer offers Update because the renewal is the current notice.

12. Your Profile

The Profile page displays account information obtained from FIS/OAA: First Name, Last Name, Email, User ID, Role, and Company/Firm. These fields are read-only in SBNLE.

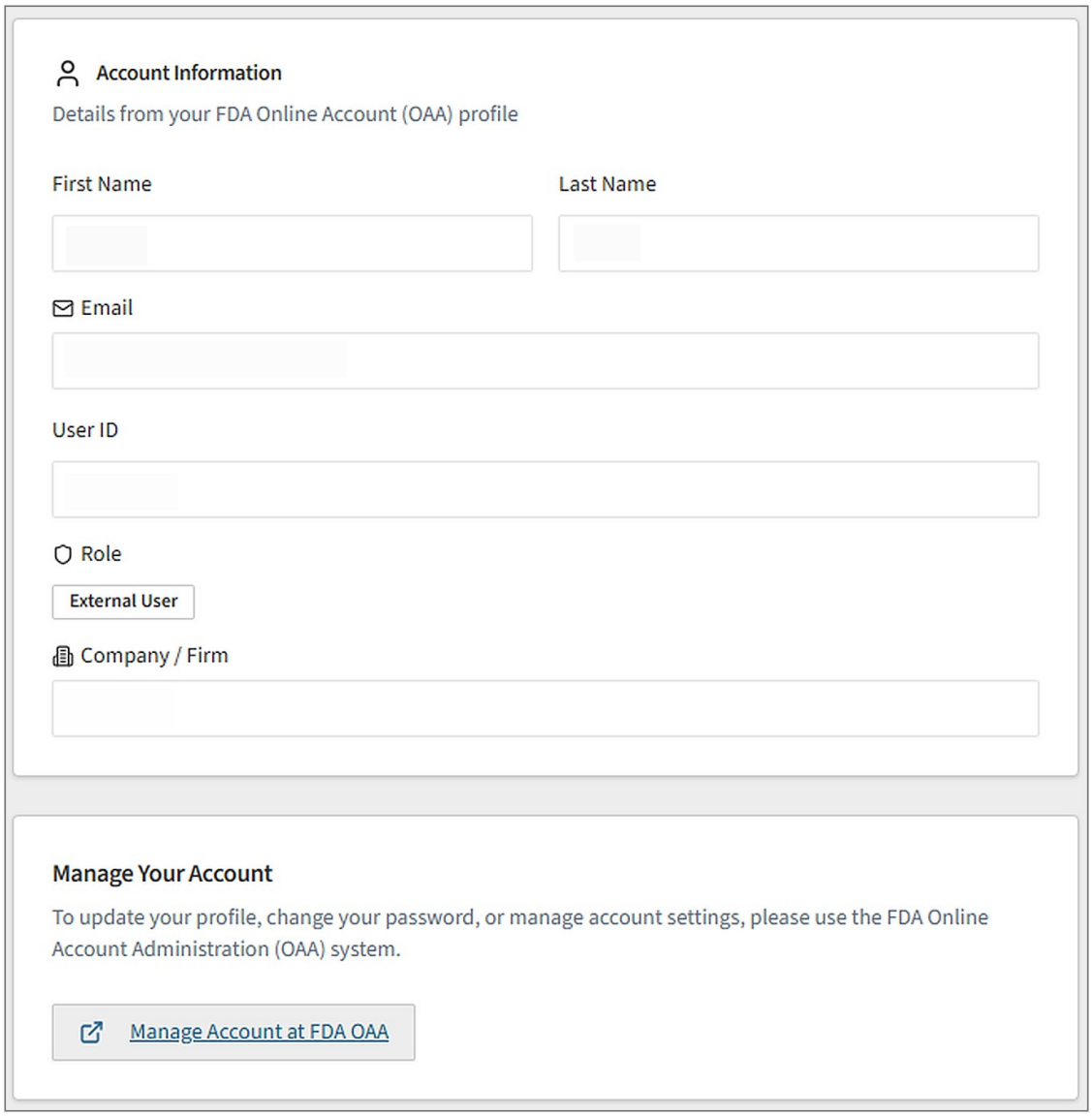


Figure 29. Profile page and Manage Account option.

To change your name, email, password, company information, or module access, select Manage Account at FDA OAA. Account management opens in a new browser tab.

See the FDA Industry Systems Account Management Guide for account and system-access instructions.

13. Submitting Feedback

Use Feedback to send a general question, report a bug or error, or request a change.

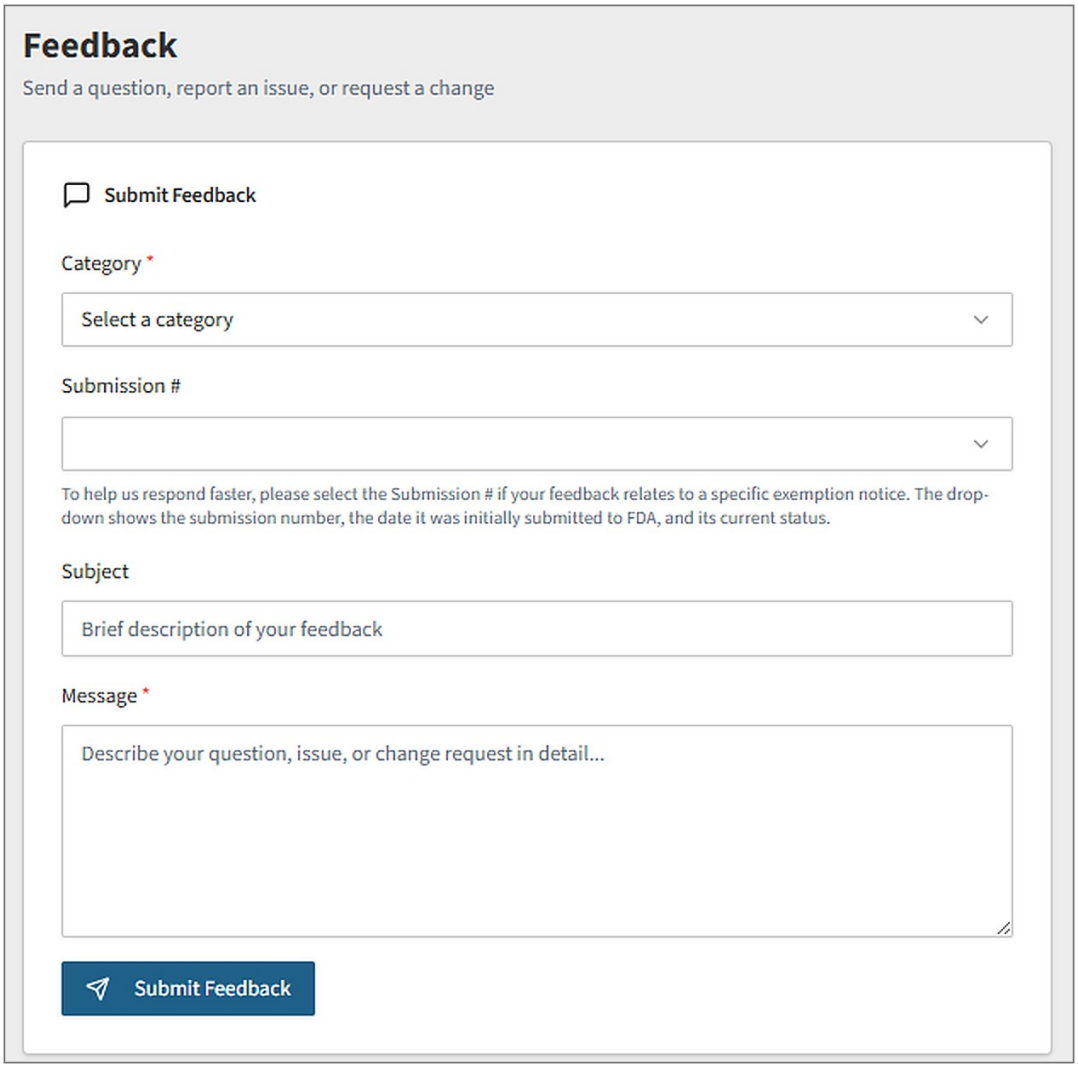


Figure 30. Feedback form.

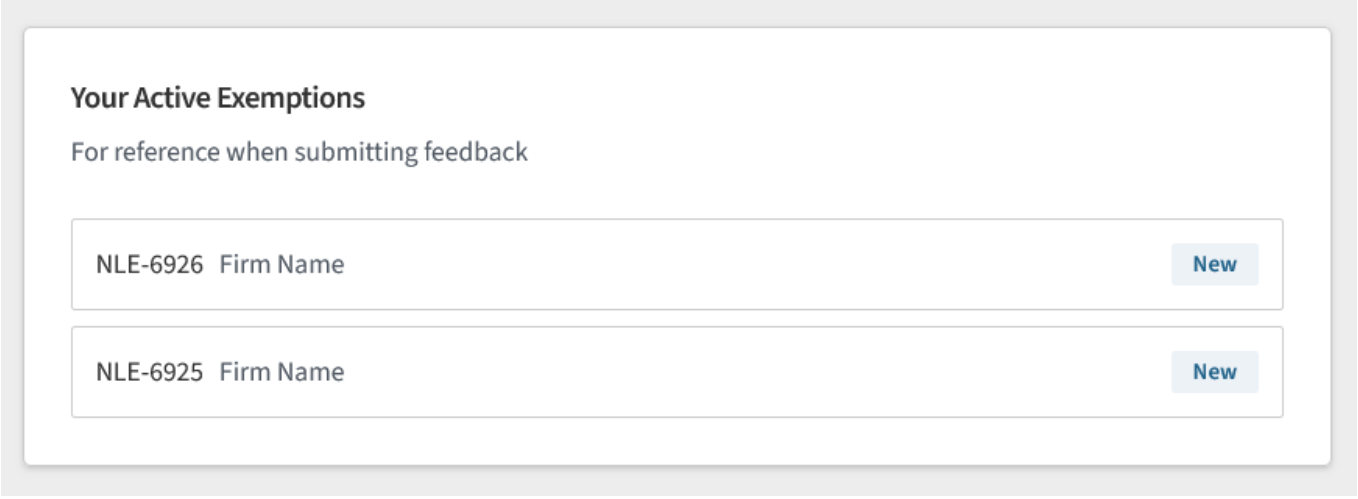


Figure 31. Active-exemptions reference on the Feedback page.

Complete and submit the form

1. Choose a Category: General Question, Bug / Error, or Change Request.
2. Optionally select a Submission number when the feedback concerns a specific notice. The list identifies each submission by number, original filing date, and current status.
3. Optionally enter a Subject.
4. Enter the required Message.
5. Select Submit.

The application confirms: "Thank you for your feedback! Your message has been sent to the SBNLE team. We will review it and respond if needed."

14. Help & Reference

Help & Reference is available from the main navigation and provides definitions, regulatory references, eligibility information, and links to external FDA resources. The screenshots below are divided into readable panels rather than displaying the entire long page at a reduced size.

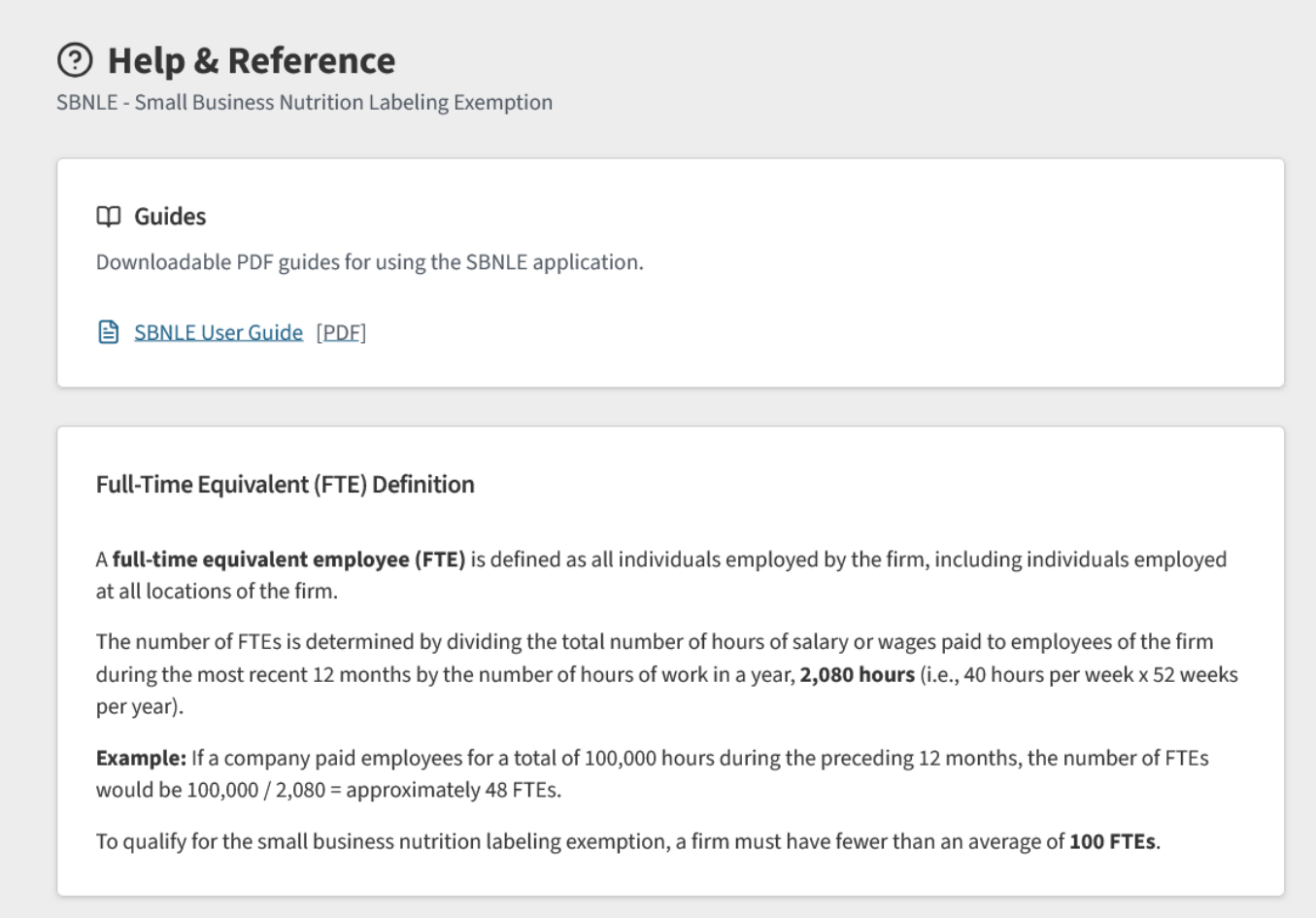


Figure 32. Help & Reference: guide link and FTE definition.

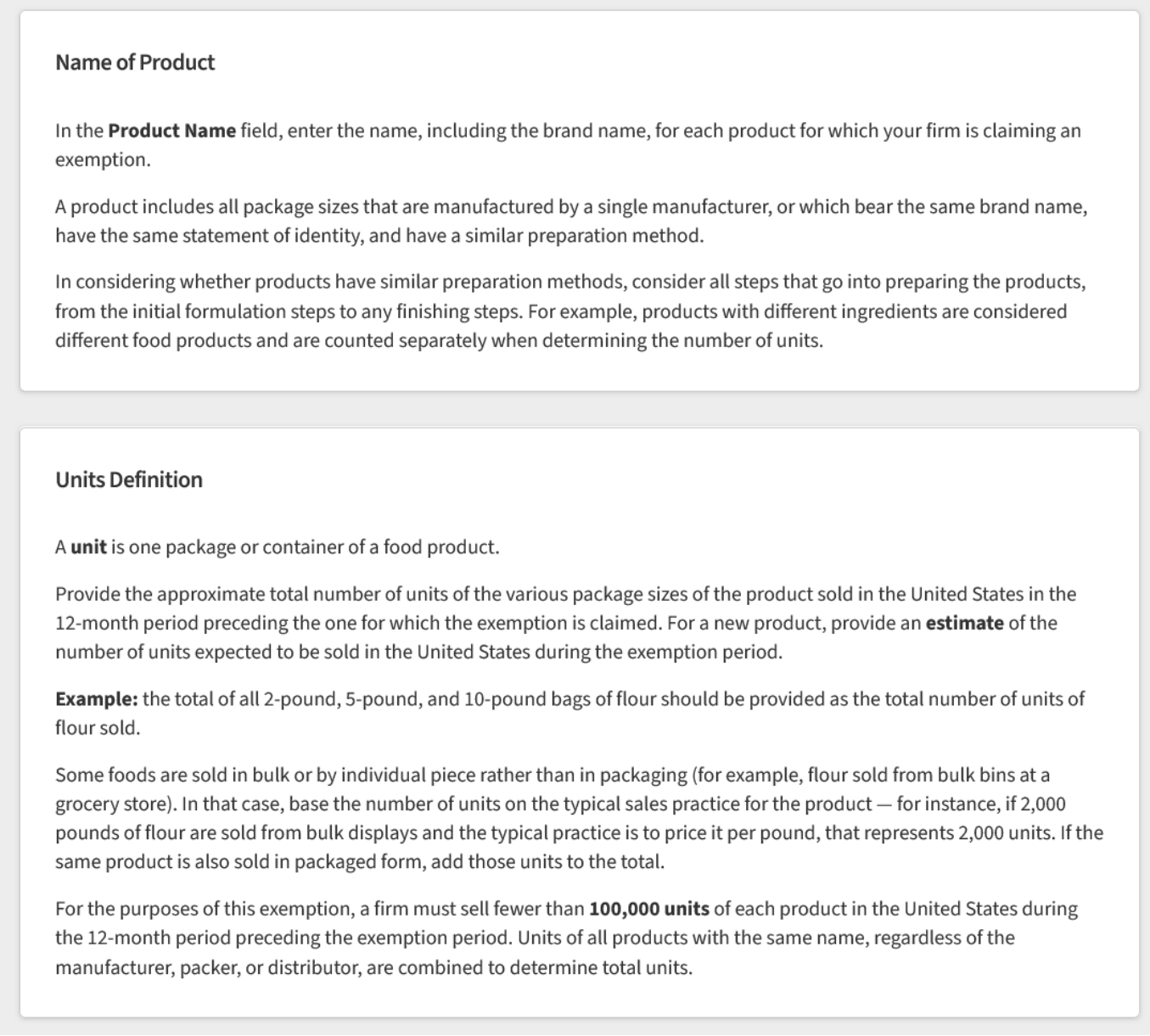


Figure 33. Help & Reference: product and unit definitions.

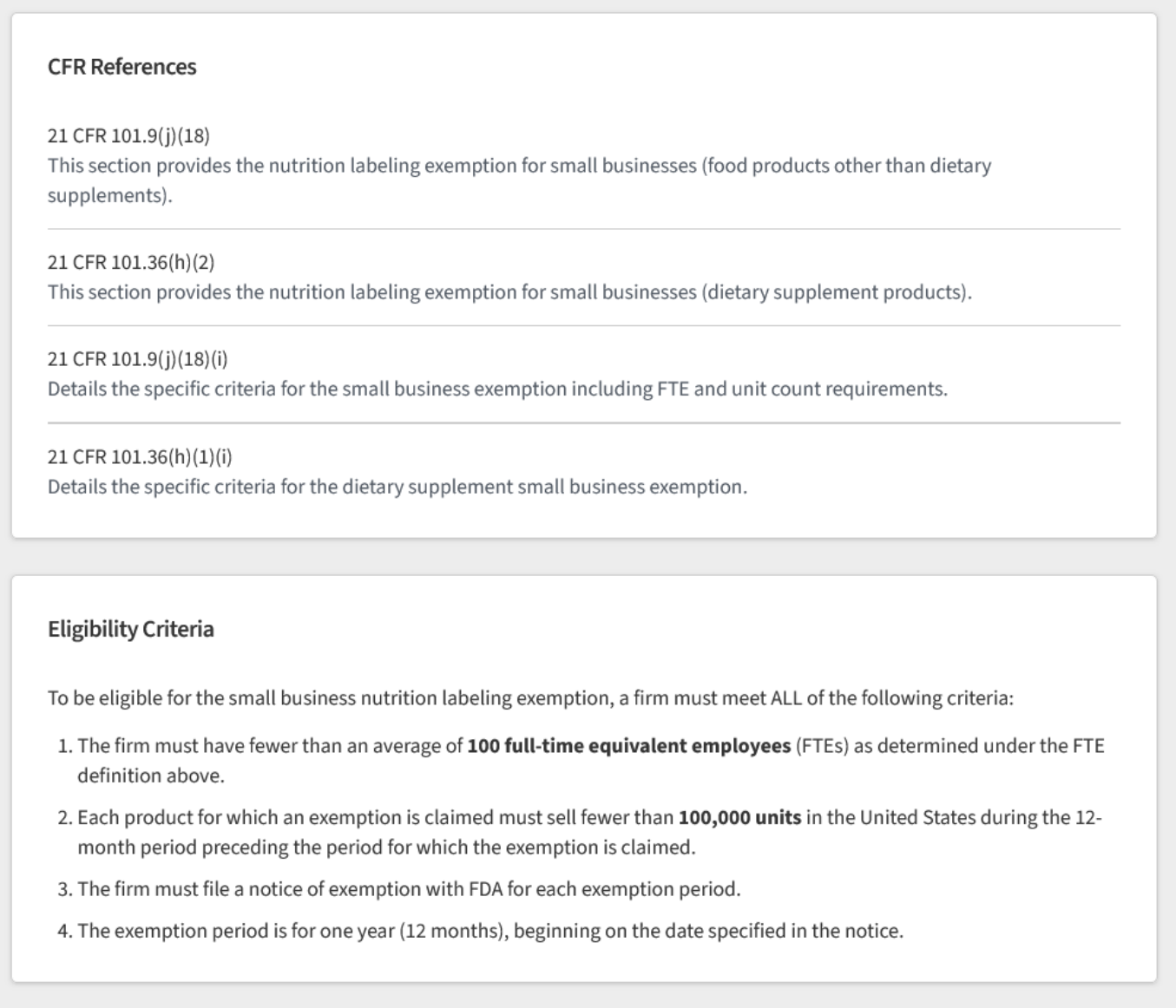


Figure 34. Help & Reference: CFR references and eligibility criteria.

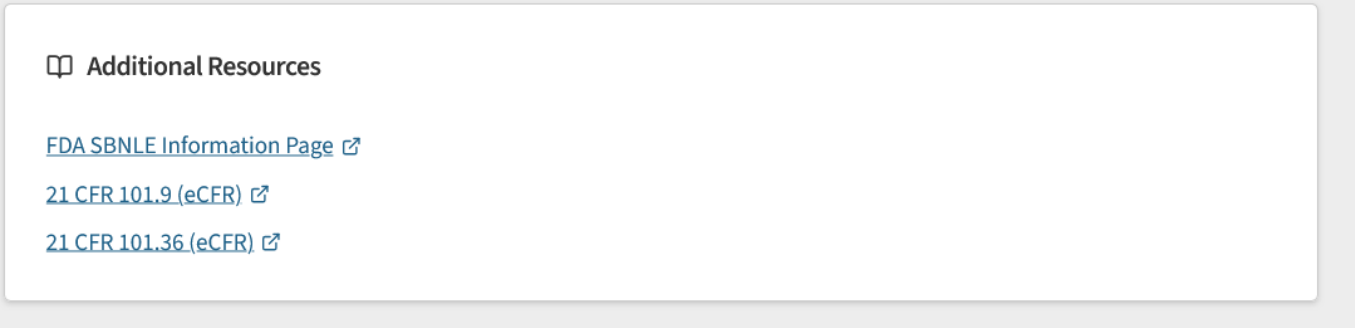


Figure 35. Help & Reference: additional resources.

The Help page includes:

1. **SBNLE User Guide:** Instructions for using the application.
2. **Full-Time Equivalent (FTE) Definition:** Detailed calculation guidance with an example.
3. **Name of Product:** What the application treats as a single product.
4. **Units Definition:** What counts as a unit and how the 100,000-unit threshold is evaluated.

5. **CFR References:** Regulatory sections governing the exemption.
6. **Eligibility Criteria:** A quick checklist.
7. **Additional Resources:** Links to FDA program information and eCFR sections.

Online FDA resources

1. FDA Industry Systems: Sign in and check system status.
2. FDA Industry Systems Help & Support: Technical-support contact information.
3. FDA Industry Systems Account Management Guide: Manage profiles, passwords, and module access.
4. FDA Industry Systems Subaccount Management Guide: Create and manage separate filer accounts.
5. Small Business Nutrition Labeling Exemption program page: Program overview and online submission access.
6. Small Business Nutrition Labeling Exemption Guidance: Eligibility definitions and filing instructions.
7. 21 CFR 101.9: Nutrition labeling requirements for food.
8. 21 CFR 101.36: Nutrition labeling requirements for dietary supplements.

Appendix A: Key Rules & Limits

Rule	Value
FTE range	1-99 in the application; the firm must employ fewer than an average of 100 FTEs to qualify.
Unit limit per product	Fewer than 100,000 units sold in the United States during the 12-month exemption period. The application may group matching product entries and total their units.
Start-date window	Today through four months from today.
Exemption period	Start date plus one year, minus one day.
Renewal window	Within 30 days before or 30 days after the end date, while the status is Reviewed and the notice has not already been renewed.
Maximum products per submission	250.
Maximum product-name length	115 characters.
Maximum filer comment	1,000 characters.
Filing frequency	One completed notice for each 12-month exemption period; file annually and keep a copy.
Small-firm filing exception	A non-importer with fewer than 10 FTEs does not need to file for a food product with annual sales below 10,000 total units.
Session inactivity timeout	30 minutes, with a warning approximately five minutes before sign-out.

Watchwords that may trigger nutrition-labeling review

The application evaluates these terms without regard to case and may display a warning when they appear as whole words in a product name:

> Light, Lite, Zero, No, Free, Reduced, Enriched, More, High, Sugar Free, No Sugar Added, Low, Lo, With, Added, Fortified, Lean, Extra Lean, High Potency, Rich In, Excellent Source Of, Good Source Of, Contains, Provides, Plus, Extra.

Reminder: A watchword warning does not by itself determine eligibility. Review the product label, labeling, and advertising for nutrient content claims, health claims, or other nutrition information.

Appendix B: Status Definitions

Status	Meaning
Draft	Started but not submitted to FDA.
Pending	Submitted and awaiting FDA review.
Reviewed	FDA review completed; the notice is currently in effect.
Returned	Sent back to the filer. Review the return reasons, correct the notice, and resubmit.
Resubmitted	Corrected and sent back to FDA after being Returned.
Updated	A previously Reviewed notice that the filer subsequently updated.
Expired	The end date has passed. Renewal may be available within the allowed renewal window.

End of guide