



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

New Business Guide

A Step-by-Step Roadmap for Bringing a Food or Beverage Product to Market

CSU Spur Campus • 4780 National Western Dr., Terra Building, Denver, CO 80216

foodinnovation@colostate.edu • csuspur.org

Updated July 2026

Table of Contents

1. Before You Start A Business.....	12
1.1 Ideation.....	12
1.2 Scaling.....	12
1.3 Organization and Financing.....	12
1.4 List and Assess Priorities.....	12
2. Form Your Business.....	13
2.1 Determine your business structure.....	13
2.2 Register your manufacturing facility with the FDA, if required.....	13
2.3 Obtain an Employer/Tax Identification Number (EIN/TIN).....	13
2.4 Finalize your business plan.....	13
2.5 Protect your brand name and logo.....	13
3. Determine Where/How Your Food May Legally Be Produced.....	14
3.1 Can I manufacture in my home and sell under Cottage Foods laws?.....	14
3.2 Can I manufacture my product in a shared or commissary kitchen?.....	15
3.3 Can I produce my product in a co-manufacturer or co-packer?.....	15
3.4 Can I produce my product in my own proprietary food manufacturing facility?.....	16
3.5 Can I manufacture wholesale or B2B foods only?.....	16
4. Get The Required Licenses.....	17
4.1 Licenses required for Cottage Foods manufacture.....	17
4.2 Licenses required for retail or wholesale food manufacture in an inspected facility.....	17
5. Get Required Permits.....	19
5.1 Permits required for Cottage Foods manufacture.....	19
5.2 Permits required for retail or wholesale food manufacture in an inspected facility.....	19
6. Get Required Insurance Policies.....	20
6.1 Insurance required for Cottage Foods manufacture.....	20
6.2 Insurance required for retail or wholesale food manufacture in an inspected facility.....	21
7. Take Required Or Recommended Trainings.....	22
7.1 Trainings required for Cottage Foods operators.....	22



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

7.2	Trainings required for retail or wholesale food manufacture in an INSPECTED facility.....	22
7.3	Specific trainings required for acidified or low-acid canned foods manufacture.....	22
8.	Display Your Licenses, Permits, And Required Policies As Required By Local County Clerk’S Office And Health Department Display Ordinances.....	23
8.1	If manufacturing under Cottage Foods laws in a home kitchen.....	23
8.2	If manufacturing in a shared or commissary kitchen.....	23
8.3	If manufacturing in a co-manufacturer or co-packer.....	23
8.4	If manufacturing in a proprietary food manufacturing facility.....	23
9.	Get A Process Authority Letter And File A Scheduled Process, If Required.....	24
9.1	What is a scheduled process?.....	24
9.2	Who has to file a scheduled process?.....	24
9.3	Determine if your product requires a scheduled process.....	24
9.4	If you NEED to file a scheduled process, proceed through the following steps.....	25
9.5	FAQs about filing a scheduled process.....	28
9.6	If you DO NOT need to file a scheduled process, determine if your product requires a HACCP plan instead.....	29
9.7	If you DO NOT need to file a scheduled process OR write a HACCP plan, determine if your product would benefit instead from an Exemption Letter or a Letter of Guarantee.....	29
10.	Manage Ongoing Compliance.....	30
10.1	Maintain periodic updates, renewals, etc.....	30
10.2	Maintain required or recommended documents.....	30
10.3	Other compliance considerations.....	35
11.	Relevant Services Provided By The CSU Spur Food Innovation Center.....	37
11.1	Product Development.....	37
11.2	Food Analysis.....	38
11.3	Process Authority Services.....	38
11.4	HACCP Plan Creation or Advising.....	38
11.5	Nutrition Facts Panels (NFP).....	38
11.6	Label Review.....	38
11.7	Shelf-Life Testing.....	38



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

11.8	Commissary Kitchen Space.....	38
11.9	Sensory Testing Services.....	38
11.10	Consulting and Advice.....	39
11.11	Free Resources by Request.....	39
11.12	Contact Information.....	39
12.	Other Resources And Additional Support.....	39
12.1	Basic Links, Resources, Agencies.....	39
12.2	Commissary Kitchen Resources.....	39
12.3	Cottage Foods Resources.....	40
12.4	Advising, Mentorship, Resources, Networking.....	40
12.5	Financial Assistance (Grants, Loans, Prizes, Incentives).....	40
12.6	Certification Information and Resources.....	41
12.7	Food Safety Resources.....	42
12.8	Resources available from the CSU Spur FIC upon request (foodinnovation@colostate.edu).....	42

How to Use This Guide

This guide walks you through the major steps of launching a packaged food or beverage business — from validating your idea and forming your company to obtaining the right licenses, permits, insurance, and food-safety approvals, and staying compliant as you grow. Not every step applies to every business; your path depends on what you make, how it must be produced, and where you sell it. Use the table of contents to jump to the sections that fit your product, and reach out to the CSU Spur Food Innovation Center any time for help.

This guide is provided for general educational purposes and reflects laws and resources current as of July 2026, with a focus on Colorado. Regulations change and vary by state and locality — always verify current requirements with the relevant agency before acting. It is not legal advice.

Prepared and reviewed by:



Caitlin S. Clark

Senior Food Scientist · CSU Spur Food Innovation Center

Reviewed July 2026

Choose Your Path

Not every step in this guide applies to every business. Your path depends on what you make, how it must be produced, and where you sell it. Answer the questions below to find your path, then use the map on the next page to see which sections apply to you.

Path A — Cottage Foods (home kitchen) — You are a Colorado resident making only low-risk, shelf-stable foods (baked goods, jams, dry mixes, candies, honey, dried produce) at home and selling directly to consumers, under \$10,000 per product per year. Note: acidified foods, canned foods, sauces and hot sauces, beverages, and jerky are NOT eligible. See [§3.1](#). (Watch for the 2027 “Tamale Act” expansion.)

Path B — Commissary / Shared Kitchen — You need an inspected kitchen but will do the production work yourself, usually at modest volume. See §3.2.

Path C — Co-Manufacturer / Co-Packer — You want a contract manufacturer to produce your product at scale so you don’t handle the food yourself. See §3.3.

Path D — Proprietary Facility — You are building or operating your own inspected production facility — usually the last step of growth. See §3.4.

Selling wholesale / B2B only? — The same inspected-facility rules apply; you differ mainly in labeling. See §3.5.

Outside Colorado? Cottage food rules and sales caps vary by state. Check [Forrager](#), the Harvard Food Law & Policy Clinic 50-state survey, or the [Farm-to-Consumer cottage foods map](#) (all linked in §12), then use the same four paths.



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

Which Sections Apply to You

Guide section	A • Cottage	B • Commissary	C • Co-Packer	D • Proprietary
1 Before You Start	✓	✓	✓	✓
2 Form Your Business	✓	✓	✓	✓
3 Where/How Produced	✓	✓	✓	✓
4 Licenses	●	✓	✓	✓
5 Permits	—	●	●	✓
6 Insurance	●	✓	●	✓
7 Trainings	✓	✓	●	✓
8 Display Licenses	✓	✓	●	✓
9 Process Authority / Scheduled Process	—	●	●	●
10 Ongoing Compliance	●	✓	●	✓
11 FIC Services	✓	✓	✓	✓
12 Other Resources	✓	✓	✓	✓

✓ Applies to you ● May apply, or is often handled by your facility or co-packer — Usually not applicable



Quick-Start Checklists

Print the checklist that matches your path. Section references (§) point to the full detail later in this guide.

[Required] = mandated by law [Recommended] = strong best practice [Varies] = depends on your locality/facility

Path A — Cottage Foods (Colorado)

☐	[Required] Confirm your product is eligible (low-risk, shelf-stable, non-TCS) §3.1
☐	[Required] Confirm you are a Colorado resident selling directly to consumers §3.1
☐	[Required] Take an approved Cottage Foods safety course (certificate valid 3 years) §7.1
☐	[Required] Apply the required home-kitchen label and disclaimer §8.1
☐	[Varies] Check your city/county tax and business-license requirements §4.1
☐	[Required] Track sales — stay under \$10,000 per product per year §3.1
☐	[Recommended] If pickled/fermented: use CDPHE's free pH testing (up to 5 products) §3.1
☐	[Recommended] Consider liability insurance (encouraged, not required in CO) §6.1

Paths B / C / D — Inspected-Facility Production

☐	[Required] Choose your production path (commissary, co-packer, or proprietary) §3
☐	[Required] Form your business and obtain an EIN/TIN §2
☐	[Required] Register your facility with the FDA if you will handle the food §2.2
☐	[Required] Get a state sales-tax license and local business licenses §4.2
☐	[Required] Determine whether you are FDA- or USDA-regulated §4.2
☐	[Varies] Obtain required permits (health, zoning, fire,



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

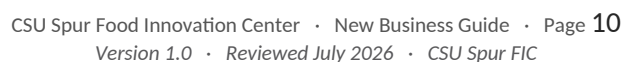
	weights & measures) — or confirm your facility/co-packer holds them §5.2
☐	[Required] Secure required insurance (liability, product, recall, workers' comp) §6.2
☐	[Required] Complete required trainings (Food Protection Manager; BPCS if acidified/LACF) §7.2-7.3
☐	[Varies] Determine if you need a Scheduled Process and Process Authority letter §9
☐	[Required] Build your written Food Safety Plan and records system §10
☐	[Required] Verify FDA-compliant labeling (nine major allergens, incl. sesame) §10.3



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

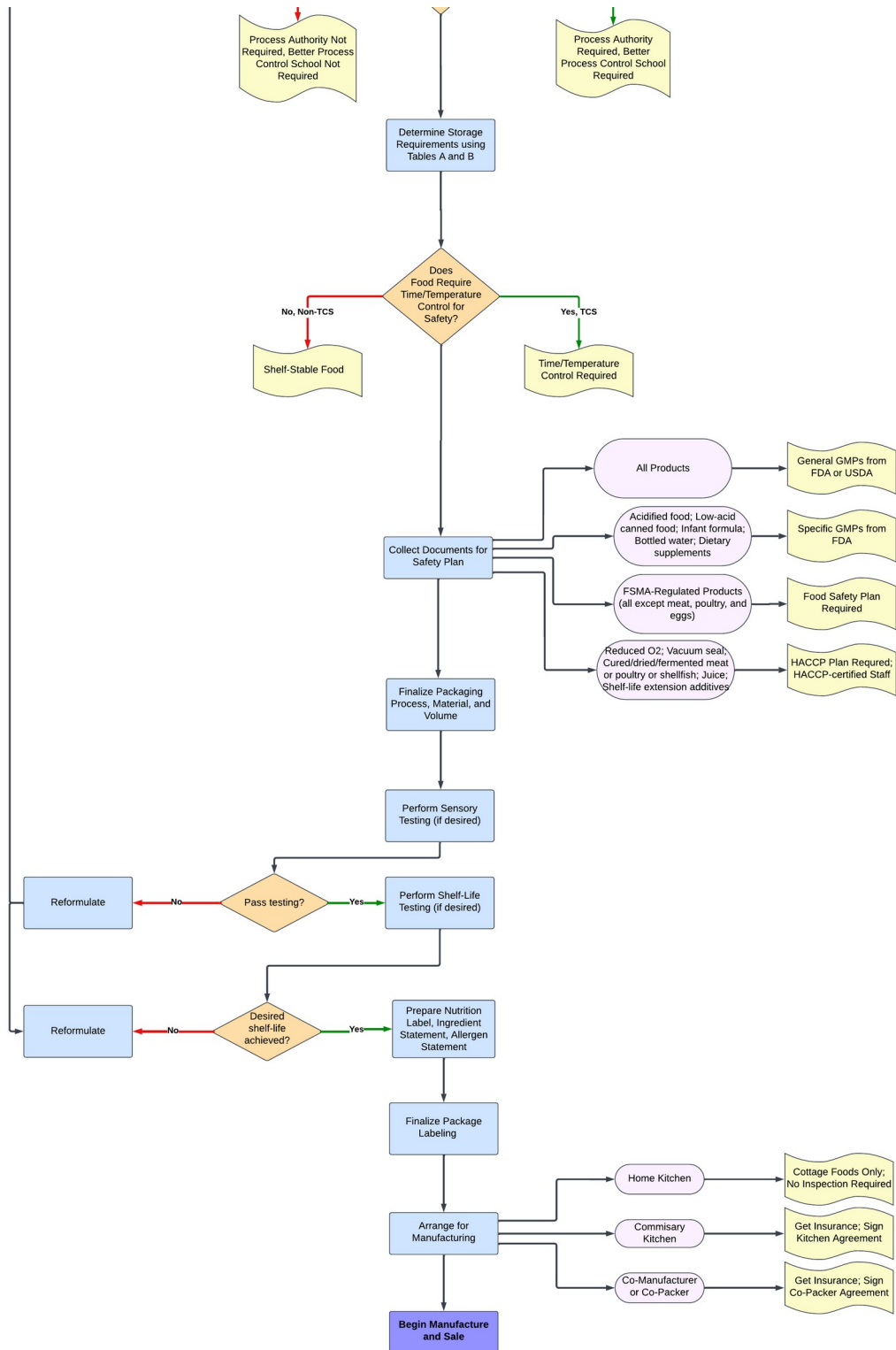
Visual Roadmap

The flowchart on the next two pages traces the full path from recipe to market — cottage-food eligibility, licensing, regulatory agency, food-safety requirements, and manufacturing options. Use it as a bird's-eye companion to the step-by-step sections that follow.





FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY





Visual Roadmap — Text Version

The diagram above traces the full path from recipe to market. The steps and decision points below present the identical logic in accessible text form, for screen-reader users and for anyone who prefers a linear read-through.

Step 1: Start with your recipe

Step 2: Convert your recipe to a formula

Express your recipe by weight and by percentages.

Step 3: Conduct market research and sector alignment

Decision 1: Is your product allowed as a Cottage Food?

Products that ARE allowed as Cottage Foods include:

- Pickled produce with pH below 4.6
- Dry spices
- Dry teas
- Dehydrated produce
- Nuts and seeds
- Honey
- Fruit jam/jelly
- Fruit preserves/butter
- Flour
- Candies
- Baked goods, except those with buttercream frosting or with cream, custard, or meringue filling/topping
- Roasted coffee beans
- Canned fruits
- Freeze-dried produce
- Fruit empanadas, tortillas, and similar non-TCS foods
- Some other non-TCS foods (no time/temperature control required)

Products that are NOT allowed as Cottage Foods include:

- Foods containing any meat, poultry, fish, or shellfish, including jerky
- Baked or fried goods with cream, custard, or meringue fillings or toppings
- Cakes or pastries with buttercream (unless made with ghee or vegetable oil)
- Sauces such as barbeque, hot sauce, pasta sauce, pizza sauce, or salad dressing

- Beverages
- Salsa
- Condiments such as ketchup and mustard
- Pumpkin, sweet potato, and cream pies
- Cut fresh fruits and vegetables
- Fruit or vegetable juices, concentrates, or purees
- Pepper jelly or jams made with fresh peppers or homemade dehydrated peppers
- Any cannabis product

Step 4: Determine your desired sales level and achieve the matching licenses/registrations

- **Cottage Foods** → No license or registration required
- **Wholesale** → Register with CDPHE
- **Retail** → Both a sales tax license AND a business license are required

Step 5: Determine and take the relevant safety training

- **Cottage Foods** → Cottage Foods Safety Training through CSU Extension
- **Retail** → Food Safety Manager Certification (at least one employee)

Step 6: Determine which regulatory agencies are involved

Decision 2: Does your product have significant poultry, egg, meat, or catfish content?

- **If YES** → USDA jurisdiction applies, and USDA inspection is required. USDA-regulated criteria include:
 - Poultry products
 - Products with more than 3% raw meat/animal parts, or more than 2% cooked meat/animal parts
 - Products with more than 2% cooked poultry meat, or more than 10% poultry parts
 - Closed-face sandwiches
 - Shell eggs
 - Egg-containing products such as dried, frozen, or liquid eggs, with or without added ingredients
 - Homogenous cheese and meat products with more than 50% meat, whether combined or packaged separately
- **If NO** → FDA jurisdiction applies (FDA regulation only). FDA-regulated criteria include:
 - Non-specified red meats (bison, rabbit, game, etc.)
 - Non-specified birds (wild turkey, wild duck, wild goose)
 - Products with less than 3% raw meat/animal parts, or less than 2% cooked meat/animal parts



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

- Products with less than 2% cooked poultry meat, or less than 10% poultry parts
- Closed-face sandwiches
- Shell eggs and egg-containing products not covered by USDA jurisdiction, including freeze-dried products, egg substitutes, dietary foods, no-bake custard mixes, egg nog mixes, noodles, milk and egg dip, cake mixes, French toast, sandwiches containing eggs, balut, etc.

Step 7: Determine your regulatory processes/operations

Decision 3: Is your food low-acid, acidified, fermented, or pasteurized?

- **If NO** → A Process Authority is not required, and Better Process Control School is not required.
- **If YES** → A Process Authority IS required, and Better Process Control School IS required.

Step 8: Determine storage requirements

Use Tables A and B (referenced in §12.7 of this guide).

Decision 4: Does your food require time/temperature control for safety (TCS)?

- **NO, non-TCS** → Your food is shelf-stable.
- **YES, TCS** → Time/temperature control is required.

Step 9: Collect documents for your safety plan

- **All products** → General GMPs from FDA or USDA
- **Acidified food, low-acid canned food, infant formula, bottled water, or dietary supplements** → Specific GMPs from FDA
- **FSMA-regulated products (all except meat, poultry, and eggs)** → A written Food Safety Plan is required
- **Reduced-oxygen packaging, vacuum sealing, cured/dried/fermented meat, poultry, or shellfish, juice, or shelf-life-extension additives** → A HACCP plan is required, with HACCP-certified staff

Step 10: Finalize your packaging process, material, and volume

Step 11: Perform sensory testing (if desired)

Decision 5: Did your product pass testing?

- **NO** → Reformulate, and return to Step 2 (Convert Recipe to Formula).
- **YES** → Continue to shelf-life testing.

Step 12: Perform shelf-life testing (if desired)

Decision 6: Did you achieve your desired shelf-life?

- **NO** → Reformulate, and return to Step 2 (Convert Recipe to Formula).

- **YES** → Continue to labeling.

Step 13: Prepare your Nutrition Facts label, ingredient statement, and allergen statement

Step 14: Finalize your package labeling

Step 15: Arrange for manufacturing

- **Home kitchen** → Cottage Foods only; no inspection required
- **Commissary kitchen** → Get insurance; sign a kitchen agreement
- **Co-manufacturer or co-packer** → Get insurance; sign a co-packer agreement

Step 16: Begin manufacture and sale



1. Before You Start A Business

1.1 Ideation

Market Research

- Do people want to buy this? If so, which people? Who is your [bullseye customer](#)? Are other brands selling something similar? If so, how do they package it? Where is it located in the store (Shelf-stable? Refrigerated section?) How is it priced? What ingredients does it include/exclude? What claims does it make on its label?
- Estimate Cost of Goods (COGs)
- [Begin writing a business plan](#)

1.2 Scaling

- Convert your recipe to a scalable formula by formula weight
- Project likely units sold under different conditions (best to worst case scenario)
- Re-evaluate COGs in light of projections and scaled formula

Estimate the likely cost-per unit of your product

- Include cost estimates for raw materials, labor, operating fees, insurance, bottles, lids, packaging, labeling, printing, etc.

1.3 Organization and Financing

- Establish a system to track your business finances
- Prepare financial projections
- Begin seeking funding

1.4 List and Assess Priorities

Make a list of your priorities for your product or brand

- For example: organic, clean-label, great taste, shelf-stable with a shelf-life of 18 months, packaged in glass bottles, avoids seed oils, contains no gums, contains no artificial preservatives, manufacturing cost maxes at \$X per unit

Order these priorities from absolutely non-negotiable to possibly negotiable depending on the situation

- For example, many small brands find that some ingredients they require are not available organic-certified until they are producing at larger volumes, so they decide to de-prioritize organic certification until they have grown. As another example, some brands find that a formula without certain ingredients does not give them a long enough shelf-life, causing consumers or retailers to reject the product. Start your business in the full awareness that you will not be able to achieve all



the things you listed on your priority list. Which of these items are absolutely non-negotiable from day one? And which can be pushed back to be part of your 3-year or 5-year plan?

Begin Establishing Your Brand Identity

- Company and/or brand name
- Logo and brand colors
- Label graphics
- Brand social media platform

2. Form Your Business

2.1 Determine your business structure

- Choose between sole proprietorship, LLC, partnership, or corporation based on your needs. [More info here \(not a government site\)](#)

2.2 Register your manufacturing facility with the FDA, if required

- If you are producing food under [Cottage Foods](#) laws and manufacturing at home, you are not required to register with the FDA
- If you will be manufacturing food in a shared/commissary kitchen or in your own proprietary facility, or any situation in which you will be handling the food, then you must [register your business with the FDA](#) using form 3537 under the [FSMA-amended Bioterrorism Act](#). Registration must be renewed every even-numbered year between Oct 31 and Dec 31 of that year. Registration is not tied to your business but to your manufacturing space
- If you will be manufacturing food in a co-manufacturer, and you will be contracting out 100% of the food handling labor and not handling the food yourself, then you are not required to register with the FDA. Later, if you are required to file form 2541, you will use your co-manufacturer's Food Facility Registration (FFR) number

2.3 Obtain an Employer/Tax Identification Number (EIN/TIN)

- Apply for an Employer Identification Number [through the IRS](#)

2.4 Finalize your business plan

- You'll need to show this to potential investors

2.5 Protect your brand name and logo

- Registering your business name with the state does not protect your brand. To stop others from using your name or logo, register a federal trademark with the [U.S. Patent and Trademark Office \(USPTO\)](#).
- Search the [USPTO trademark database](#) first to make sure your name and logo are not already taken.



- Costs and timelines vary; many brands use a trademark attorney. A trademark is not required to sell, but it is strongly recommended before you invest in packaging and marketing.

3. Determine Where/How Your Food May Legally Be Produced

3.1 Can I manufacture in my home and sell under [Cottage Foods](#) laws?

[Cottage Foods](#) laws allow extremely low-risk categories of foods to be manufactured at home (without inspection) and sold under lighter labeling and packaging control. To confirm if your product is eligible to be sold under the Cottage Foods Act, you should first consult [this list \(see page 2\)](#) and if still unclear, you can contact (303) 692-3645 then select option #2 or email cdphe_mfgfd@state.co.us

- These are foods that have very low risk of being hazardous to consumers. They do not require time/temperature control for safety. They do not require pH or water-activity control for safety. They do not require a special manufacturing environment. They cannot easily spoil or grow pathogens. They are manufactured at low volumes and may be sold only direct-to-consumer, not distributed to a storefront, grocery store, or other B2B pathway
- Cottage Foods laws [differ in every state](#)—determine if your food is [permissible](#) under Cottage Foods Laws [in the state](#) where you want to sell it using [resources like these](#)
- Note that most acidified foods, most canned foods, sauces (including hot sauce), beverages, and jerky are not eligible for cottage foods sales with rare exceptions (such as foods with longstanding and well-validated home-preparation protocols, like pickled vegetables)
- Only Colorado residents may sell under Cottage Foods laws in Colorado. Company and products must be compliant with the guidelines outlined on [this checklist](#) from CSU Extension.
- Colorado caps Cottage Foods sales at \$10,000 per product per calendar year. Each flavor or variety counts as its own product with a separate \$10,000 limit, so you can sell several products and earn more than \$10,000 overall ([Colorado Cottage Foods Act](#), C.R.S. § 25-4-1614).
- Coming January 1, 2027 — the “Tamale Act” ([HB26-1033](#), signed June 2026) expands the Colorado Cottage Foods Act to allow certain refrigerated and meat-containing foods that require time/temperature control for safety, such as tamales, burritos, and tortas. Producers of these foods must complete a food-safety course covering time/temperature control and may sell one type of such product with up to five variations. Confirm current requirements with CDPHE before relying on this expansion.
- If your product is not eligible for sale under Cottage Foods laws, but you still wish to sell it at a farmers market, you may do so if and only if the product is packaged, licensed, produced, and regulated as fully FDA-compliant retail food and manufactured in an inspected facility such as a commissary kitchen or copacker (see below)
- Cottage foods generally may be sold only in person, directly to consumers, within your own state. In most states you may not ship them, sell them online to out-of-state customers, or sell them wholesale. Shipping across state lines places you under full FDA / inspected-facility rules — so if you plan to ship or sell online, plan for inspected-facility production from the start.



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

- CDPHE offers [free pH testing](#) for up to 5 products for producers of the following Cottage Foods products, to determine/confirm that they are safe for sale:
 - Chutney
 - Kimchi
 - Pickled fruits
 - Pickled vegetables
 - Pickles
 - Relish
 - Sauerkraut
 - Vinegar (fruit/vegetable)

3.2 Can I manufacture my product in a shared or commissary kitchen?

These shared-use rentable spaces are used for foods intended for retail, wholesale, or B2B distribution that must be produced in an inspected food manufacturing facility

- A commissary or shared kitchen may be the first step after home production. Alternatively a shared kitchen may be used because the product is ineligible for Cottage Foods manufacture either because they are ineligible for safety reasons (they may require refrigeration, pH, water activity, Brix control, etc.) or because business sales volumes are too high
- If your food is shown as ineligible on [this list \(see page 2\)](#) of items ineligible for Cottage Foods sales, it must be manufactured in an inspected food manufacturing facility regardless of where/how you intend to sell it
- All acidified foods, low-acid canned foods, or any other category of food requiring a filed Scheduled Process or requiring a HACCP plan must be manufactured in an inspected food manufacturing facility, such as a commissary kitchen or co-packer
- If your product is not eligible for sale under Cottage Foods laws, but you still wish to sell it at a farmers market, you may do so if and only if the product is packaged, licensed, produced, and regulated as fully FDA-compliant retail food and manufactured in an inspected facility such as a commissary kitchen or copacker
- Commissary kitchen spaces and equipment are subject to state and local inspection, separate from the manufacturing and production records that you are required to keep as part of your business
- Commissary kitchen spaces provide only space, equipment, and sometimes storage and warehousing. Business owner is responsible for receiving ingredients, manufacturing, packaging, labeling, and distribution

3.3 Can I produce my product in a co-manufacturer or co-packer?

These contract-based relationships are for foods intended for retail, wholesale, or B2B distribution that must be produced in an inspected food manufacturing facility, when sales volumes are higher and/or when the business owner wants to outsource record-keeping, liability, and labor

- Points 3.2.1.2, 3.2.1.3, 3.2.1.4, and 3.2.1.5 above apply equally to co-manufacturing facilities



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

- Unlike shared or commissary kitchens, most co-manufacturers offer receiving, warehousing, manufacturing, packaging, labeling, and distribution services
- Negotiate your contract with a co-manufacturer very carefully in order to maintain full control of your intellectual property—some contracts allow co-manufacturers to retain control of your formula
- Questions to ask before you choose a co-manufacturer:
 - What are your minimum order quantities (MOQs), and what is the price at my expected volume?
 - Who owns my formula and intellectual property, and will you sign an NDA?
 - What are your lead times and production scheduling?
 - Which licenses, permits, and insurance do you hold, and which remain my responsibility?
 - How do you manage allergens and cross-contact, and what certifications do you hold (e.g., SQF, BRCGS, organic)?
 - Will you source ingredients, or may I supply my own?
 - What does a sample or pilot run involve, and what does it cost?
 - Can you provide references from current clients of a similar size?
- A searchable nationwide list of co-packers and co-manufacturers, as well as databases and platforms to engage in further searches, is available upon request from the CSU Spur FIC email (foodinnovation@colostate.edu)

3.4 Can I produce my product in my own proprietary food manufacturing facility?

A proprietary food manufacturing facility is usually the last step of business growth. These facilities must be inspected, and they can be used for foods intended for retail, wholesale, or B2B distribution

- Proprietary manufacturing facilities represent large sales volumes and full liability for the business owner
- Business owner will be responsible for all licenses, inspections, and permits—many of which would be handled by a co-manufacturer if one were used instead
- Business owner will be responsible for all documentation, safety plans, recalls, equipment maintenance, calibration of measurement tools, etc.—most of which would be handled by the co-manufacturer if one were used instead

3.5 Can I manufacture wholesale or B2B foods only?

These are foods intended for wholesale B2B distribution only, for sale to other businesses, but must be manufactured in an inspected facility

- Wholesale ingredients may be manufactured in any inspected facility, including a commissary kitchen, a co-manufacturer, or a proprietary food manufacturing facility
- Wholesale ingredients must remain compliant with the same record-keeping and manufacturing regulations as retail ingredients—they differ largely by the labeling regulations



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

- Note that ingredients manufactured by you for use ONLY in your own products do not count as wholesale products. In the event that you manufacture an ingredient for your own use which would require a scheduled process filing if you sold it, as long as you use it only as an ingredient in your own product, it does not require a scheduled process filing but only full GMP documentation and adequate record-keeping.
 - For example, if you make an acidified flavored syrup used as a beverage base, as long as you do not sell that syrup to other businesses or to retail customers, you do not need to file a scheduled process for it. Instead you only need to maintain GMP documents and records. However if you begin selling it, either retail or B2B, you would need to file a scheduled process.

4. Get The Required Licenses

4.1 Licenses required for Cottage Foods manufacture

Get a county or city tax license, if required in your county

- This is also called business tax certificate. You'll need to apply online through your county's website or with your County Clerk. This is not required for Cottage Foods producers in all counties—check with your County Clerk to see if it is required for you

Get a business license, if required in your county

- You must get a local tax license first in order to do this. A business license is achieved through your county. You'll need to apply online through your county's website or with your County Clerk. This is not required for Cottage Foods producers in all counties—check with your County Clerk to see if it is required for you

4.2 Licenses required for retail or wholesale food manufacture in an inspected facility

Get a state sales tax license

- In Colorado, get it through the [Colorado Department of Revenue](#)

Get a county or city tax license

- This is also called business tax certificate. You'll need to apply online through your county's website or with your County Clerk. Here is city of Denver's business licensing center's website

Get a business license

- You must get a tax license first in order to do this. A business license is achieved through your county. You'll need to apply online through your county's website or with your County Clerk. [Here is the City of Denver Business Licensing Center's website](#)

Get a food manufacturing license

- In Colorado, accomplish this using the [CDPHE's Manufactured Food or Storage Facility Registration Form](#)



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

Determine if you are FDA or USDA-regulated

- If you are USDA-regulated, you must comply with and be inspected by the USDA Food Safety and Inspection Service (FSIS)
 - USDA-regulated products are governed by the Code of Federal Regulations Title 9, Chapter III: Food Safety and Inspection Service
 - Create a HACCP plan and maintain for FSIS review under a Grant of Inspection
 - Maintain detailed records of production processes, food safety protocols, and HACCP implementations
 - Seek FSIS approval for label layout, language, etc. All product labels must be approved by FSIS
 - You must manufacture your product in a USDA-inspected facility
 - If you are using a shared inspected facility or a co-packer, inspection and documentation is their responsibility
 - If you are setting up a proprietary facility, you will need to get it inspected. Contact FSIS to obtain a Grant of Inspection, requesting that your facility be inspected by FSIS agents. FSIS will review your facility, production process, and HACCP plan. Manufacture cannot proceed without inspector's approval. Comply with regular USDA inspections, which may include some fees so plan ahead
- If you are FDA-regulated
 - FDA-regulated products are governed by the Code of Federal Regulations Title 21, Chapter 1, Subchapter B: Food for Human Consumption
 - You must manufacture your product in an FDA-inspected facility
 - You must comply with all FDA labeling requirements under 21 CFR 101

Get a wholesale business license if you will be selling wholesale

- Get it through your city or county. Here is a guide to doing this through the City of Denver. Other cities will have resources on their websites

Get a retail license if you will be selling retail

- In Colorado, get it through your local public health agency OR through CDPHE if you live in one of these counties:
 - Clear Creek
 - Dolores
 - Moffat
 - Ouray
 - Park
 - Pitkin (except the City of Aspen)
 - Rio Blanco



5. Get Required Permits

5.1 Permits required for Cottage Foods manufacture

- No permits are required for Cottage Foods manufacture in Colorado

Requirements are only

- Be a Colorado Resident,
- Be present in-person for sales to the customer
- [Display specific label and disclaimer](#)
- [Take a food safety course](#) (more info below)
- If you intend to sell your Cottage Foods product directly out of your home, rather than at a farmers market or event, cities and counties ([Denver county here](#)) have different rules—[check permit requirements in your county](#)

5.2 Permits required for retail or wholesale food manufacture in an inspected facility

Get a food facility health permit

- If you are producing in a copacker or commercial kitchen, you do not need this permit—the copacker or commercial kitchen needs it. Retail (but not wholesale or cottage foods) are required to obtain a health permit from the local health departments. This includes facility inspections and plan reviews. This requires that you (or the copacker) submit:
 - Menu and food handling procedures
 - Facility floor plan and equipment layout
 - Equipment list with manufacturer and model numbers
 - Retail establishments, copackers, and commercial kitchens submit a “[fixed location plan review](#)” with your [state health department](#)
 - Food trucks submit a “[mobile unit plan review](#)” with the [state health department](#)

Get a certificate of occupancy

- This ensures compliance with building codes for your facility and shows that your building is safe and is zoned for its intended use, and it is obtained from the city or county where the building is zoned. Different locations have different requirements so you must check with your city or county; [here is a guide to obtaining a certificate of occupancy in Denver](#). If you are producing in a copacker or commercial kitchen, you do not need this permit—the copacker or commercial kitchen needs it
 - It is required when:
 - You build a new facility
 - You change the use of a facility (it used to be a warehouse, but now you are turning it into a food production facility)
 - You make major renovations to a space



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

- You are a new tenant in an existing space already being used for the same purpose for which you'll use it
- To obtain it
 - Pass all final inspections (electrical, fire, etc.)
 - Meet all building permit requirements
 - Submit all paperwork, inspection cards, and approval letters to your state health department
 - Request your certificate of occupancy from your local building department
 - For mobile units (food trucks), temporary events, or farmers markets, you may need specific permits like mobile vendor permits or commissary agreements

Get a Zoning Permit

- If you are producing in a copacker or commercial kitchen, you do not need this permit—the copacker or commercial kitchen needs it
- Apply through your city or county zoning office; [here is Denver's city Office of Adjustment \(Zoning\) website](#)

Get a Fire Safety Permit

- If you are producing in a copacker or commercial kitchen, you do not need this permit—the copacker or commercial kitchen needs it
- Apply with your city or county fire department; [here is Denver's city fire department website](#)
- Expect an inspection before the permit is issued

Get a Weights and Measures Registration

- If you are producing in a copacker or commercial kitchen, you do not need this permit—the copacker or commercial kitchen needs it
- Apply through your state's Department of Agriculture, in most states. Reach out to the [Weights and Measures](#) division and request a visit for inspection of your NIST-certified scales

6. Get Required Insurance Policies

6.1 Insurance required for [Cottage Foods](#) manufacture

- None—no insurance is mandatory for Cottage Food producers in any state
- However Colorado is the only state that specifically mentions liability insurance in the text of its Cottage Foods law—it is strongly encouraged, but not required
- Some specific venues require various types of insurance coverage
- Insurance is a requirement to participate in certain markets, shows, and events



6.2 Insurance required for retail or wholesale food manufacture in an inspected facility

Liability Insurance

- If you are producing in a copacker, the facility is typically responsible for holding this insurance
- If you do not produce through a copacker, the brand owner is responsible for this insurance
- The seller or brand owner may have the option to be added to the copacker's general liability insurance under "additional insured" status

Product Liability Insurance

- If you are producing in a copacker, the facility is typically responsible for holding this insurance
- If you do not produce through a copacker, the brand owner is responsible for this insurance
- The seller or brand owner may have the option to be added to the copacker's general liability insurance under "additional insured" status

Recall Insurance (recommended but not required in all states)

- Not all copackers provide recall insurance, but many do
- Seller should strongly consider recall insurance if they do not have a copacker or if the copacker does not provide it

Worker's Compensation Insurance

- If you are producing in a copacker, the facility is typically responsible for holding this insurance
- If you do not produce through a copacker, the brand owner is responsible for this insurance

Property Coverage Insurance

- If you are producing in a copacker, the facility is typically responsible for holding this insurance
- If you do not produce through a copacker, the brand owner is responsible for this insurance

Other Coverages

- Depending on the type of building, equipment used, and output produced, other types of insurance may be needed
 - Auto Insurance
 - Cyber Liability
 - Marine Transport
 - Etc.



7. Take Required Or Recommended Trainings

7.1 Trainings required for Cottage Foods operators

Cottage Foods Safety Training

- [This training \(various options\)](#) is required in the state of Colorado if you will be selling under the Cottage Foods Act. You'll receive a certificate upon completion which is valid for 3 years
- If you have already taken this training in Colorado, but it has expired, you may take a "[refresher course](#)" through CSU Extension to renew your certificate. Alternatively, you may re-take the full safety training course
- In other states it is not always required, but it is always recommended to take Cottage Foods Safety Training

7.2 Trainings required for retail or wholesale food manufacture in an INSPECTED facility

Food Protection Manager (AKA Food Safety Manager) Certification

- If you are producing in a copacker or commercial kitchen, you do not need this training—the copacker or commercial kitchen needs it
- At least one employee (managerial role) who will be on-site during operating hours needs to get a [Food Protection/Safety Manager Certification](#)
- This certification is good for five years from the date of completion

Food Handler's License (some states)

- If you are producing in a copacker or commercial kitchen, you do not need this training—the copacker or commercial kitchen needs it. For a food service operation, a [Food Handler's License](#) may be required. In Colorado, it is not required, but it is strongly recommended

7.3 Specific trainings required for acidified or low-acid canned foods manufacture

Attend [Better Process Control School](#) so that you can later obtain a process authority letter

- If you are producing in a copacker or commercial kitchen, you do not need this training—the copacker or commercial kitchen needs it
- If you sell a product classified as acidified or low-acid canned food, you must attend [Better Process Control School](#). Any company producing these type of foods must have a supervisor that has Better Process Control certification on site at all times during processing.



8. Display Your Licenses, Permits, And Required Policies As Required By Local County Clerk'S Office And Health Department Display Ordinances

8.1 If manufacturing under [Cottage Foods](#) laws in a home kitchen

- A notice showing a statement that the product being sold is not subject to state inspection must be displayed on a sign or placard at the point of sale. Some states require business licenses to be visible at the point of sale (not Colorado)
- [Colorado requires this exact language](#) on the label: "This product was produced in a home kitchen that is not subject to state licensure or inspection. This product is not intended for resale." [Some other information is also required](#)
- Colorado also requires that the display of your Food Handler's Training Certificate at the point of sale for Cottage Foods; [this law differs in other states](#)
- Colorado does not require display of your business license at the point of sale for Cottage Foods; [other states do require it](#)

8.2 If manufacturing in a shared or commissary kitchen

- Individual users must display their licenses such that licenses are visible to inspectors at any time during production hours (hanging on a pegboard, in a binder that can be readily opened to a marked page, etc.).
- The shared kitchen must also display their operating licenses and commissary agreement on a wall or other visible location

8.3 If manufacturing in a co-manufacturer or co-packer

- The individual brand's business licenses are not typically displayed on the premises, but you must maintain a copy that you can readily produce upon request
- Your co-manufacturer should also have a copy in their files on-site, usually kept in the main office
- The co-manufacturer must display their facility operating license near the entrance or in the production space
- They must also display any federal, state, or local permits as required by location at all times on their premises, usually in the production space

8.4 If manufacturing in a proprietary food manufacturing facility

- A copy of the business license need not be displayed publicly, but should be kept and ideally displayed in the main office. There may be some local variation here. For example Denver requires business license to be displayed (hanging on a wall) while other counties allow them to be kept in files as long as they can be immediately produced
- Facility operating license must be posted at the entrance to the facility or in the production space.
- Any federal, local, or state licenses or permits (such as health permits, etc.) must also be posted in the production space, as required by the specific location



9. Get A Process Authority Letter And File A Scheduled Process, If Required

9.1 What is a scheduled process?

- A scheduled process is an additional regulatory requirement for certain categories of foods that pose extra health risks. It consists of a list of steps and target product metrics (such as pH or temperature) used to produce the product. A food safety authority must review these steps and metrics to decide if they are adequate to destroy pathogens of public health significance. Then, the producer files these steps along with company and product information as a commitment to always follow the schedule process when they produce the food, in order to keep consumers safe.

9.2 Who has to file a scheduled process?

- Producers of acidified foods (like hot sauce and dressing), low-acid canned foods (like canned soup), or foods using novel processes (like many fermented foods)
- The food handler is responsible for manufacturing the food using the formula and procedure laid out in the schedule process, and keeping records that target metrics have been met
- Products that require a scheduled process are never legal to sell under Cottage Foods laws

9.3 Determine if your product requires a scheduled process

Acidified Foods

- These foods have an equilibrium pH of 4.6 or lower and an equilibrium water activity of 0.85 or higher. They must be thermally processed to destroy vegetative cells. They will usually be bottled but can sometimes be seen in cans or pouches (see [21 CFR 114.3](#))
- Common examples include sauces, dressings, marinades, many beverages, some packaged ready-to-cook products

Low-Acid Canned Foods (LACF)

- These foods must have an equilibrium pH of 4.6 or higher and an equilibrium water activity of 0.85 or higher. They must be thermally and pressure processed to destroy vegetative cells and spores. They will usually be canned but can sometimes be seen in bottles or pouches (see [21 CFR 113.3](#))
- Common examples include canned soups, canned vegetables, canned beans, pouches of ready-to-eat legumes or grain-based meals

Novel Processes

- These products include those manufactured through processes that do not yet have well-established safety protocols in general or on the scale of equipment being used. They may require microbial challenge testing to verify the schedule process. Containers vary for these products
- Examples may include, but are not limited to, sprouted grains, modified atmosphere packaging, meat curing, traditional wild-culture sausage fermentation, non-alcoholic fermented beverages, solid-state fermentation products such as tempeh or meat alternatives, and more



9.4 If you NEED to file a scheduled process, proceed through the following steps

Finalize your formula, production and packaging SOPs, package volume and material, and production address

- If any of these things change, you will need to request a new PA letter and file a new schedule process, both of which cost money

Attend Better Process Control School

- This must be done before you can complete the rest of the filing process
- If a co-manufacturer will be doing all your production, you do not need this training—the copacker staff needs it. This is only required if you will actually be handling the food

Manufacture samples of your product using commercial-scale equipment

- Ideally this should be in the form of a small pilot batch at the facility where you plan to manufacture samples for sale

Send samples to a third-party lab for testing

- Send three individually packaged samples to a third party lab (such as the CSU Spur FIC, or many others) for testing. Depending on the category of your product, you may need pH testing, water activity testing, or both. In some cases other tests, such as Brix or titratable acidity may be necessary. Consult your regulatory authority if uncertain what you need

Find a Process Authority

- It is not required to use a Process Authority from your state, because regulations are enforced at the federal level
- You can search a directory such as the [AFDO Subject Matter Expert Search Page Process Authority Directory](#) (National), but they are not always up-to-date
- Process Authority services are often associated with universities, including Colorado State, Michigan State, Washington State, Oregon State, Arizona State, Penn State, Cornell, Purdue, Utah State, U of Wisconsin, and many more. Universities usually (but not always) offer reduced prices for residents of their state
- Private labs, such as Eurofins, have PA services but they are usually more expensive

Send the Process Authority the following information

- The lab's test results
- Your formula
- Your process SOP (detailing specific times and temperature at all points)
- Your package volume and material
- The name and address of the manufacturing facility



The Process Authority will review your information

- They may request that you make changes and have new samples tested. If/when they approve your schedule process, they will send you a letter and/or document that contains information that you must file with the FDA

Get a [DUNS](#) (Data Universal Numbering System) number

- This 9-digit number is a Unique Facility Identifier (UFI) for your specific manufacturing facility
- To get a [DUNS number](#) you need the following
 - Complete legal name of the facility (not trade name)
 - Physical address where processing occurs
 - Mailing address (if different)
 - Business entity type (LLC, Corporation, Partnership, Sole Proprietorship, etc.)
 - Year business was established
 - Primary industry (type of business, or what you do and make)
 - Number of employees (combined full- and part-time)
 - Name of owner or highest-ranking person
 - Business owner email address and contact info
 - Whether or not business is home-based (yes/no)
 - Your (the applicant's) name, title, email
 - Two supporting documents to verify your business, including two of the following
 - Mail (such as utility bill) in your company name, delivered to manufacturing facility address
 - EIN/TIN confirmation letter from the IRS
 - Bank account statements in business name
 - Business lease agreement (with vehicles, building, etc.)
 - Secretary of State certificate of filing
 - Business insurance policy
- It is FREE to [register a DUNS number](#), but it can take up to 30 days. You may expedite the process for a fee of around \$200, and shorten that timeline to about a week

Find your co-manufacturer's FFR number, or get your own by [filing form 3537](#), that is if you haven't done it already when you registered your business

- If you are using a co-manufacturer, you do not need to register. Simply use your co-manufacturer's FFR number (available by request from your contact at the co-manufacturer)
- If you are working from a shared/commissary kitchen or your own proprietary kitchen, or any situation where you physically handle the food, this is your responsibility. Register your business as food manufacturer by [filing form 3537](#), that is if you haven't done it already. List the shared kitchen address as your processing location. Mark your facility as "Acidified Food Processor" and/or "Low-Acid Food Processor" in Section 9



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

Gather your co-manufacturer's FCE (Food Canning Establishment Registration) number, if applicable

- If you are using a co-manufacturer, you must request this number from your co-manufacturer before filing form 2541. Simply list your co-manufacturer's FCE number in the provided space when you file form 2541 (next step).
- If you are not using a co-manufacturer, and instead you are working from a commissary kitchen, OR a proprietary food manufacturing facility, you will register for the FCE number in the next step when you file form 2541. List the shared OR proprietary kitchen address as your processing location when you file form 2541 (next step); the FDA will assign an FCE number to your business

File form 2541 to register your facility on the FDA Industry Systems (FIS) website

- The FDA hosts [a detailed online guide](#) for filing form 2541
- This must be done within 10 days of startup (startup means the first day you actually manufacture/process acidified or low-acid canned food products for commercial distribution)
- You'll need to create a login if you don't already have one
- You will need the following information
 - FIS website username
 - FIS website password
 - Processing plant name
 - Processing plant address (must match exactly what was entered on DUNS application)
 - Processing plant telephone number
 - Processing plant contact person (name, title, contact info)
 - DUNS number
 - Processing activities (e.g. "Acidified Producer" or "LACF Producer")
 - Broad categories of foods you'll process (e.g. "Hot sauces" or "ready-to-eat soups")

File form 2541d, e, f or g to register your formula and process on the FDA Industry Systems (FIS) website

- This must be done within 60 days of filing form 2541
- This form should be filed by the same entity/person that filed form 2541—if that was the co-manufacturer, they'll file this one too. If you filed 2541, you need to file this one too
- You will need the following information:
 - FCE number
 - Product name(s)
 - Formula information, including ingredient form (dehydrated, diced, etc.)
 - Packing and Processing SOP, including detailed time and temperature targets ("boiled for 16 minutes in water at 210°F" then immediately inverted for 3 minutes before stacking to cool at 70°F for 12 hours")
 - Container material and sizes (volume or dimensions)



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

- Packing and container information depending on product type (sealing method, amount headspace, vacuum level, etc.)
- Name and title of authorized account manager for business (person who can grant access to your confidential product and process information)
- Safety parameters required for Sections E and F (these should be provided in the PA letter or other documentation sent to you by the Process Authority)
- Any supporting documentation sent to you by the Process Authority—this will be uploaded in Section H Supporting Documentation
- Your Process Authority's name, institution, and contact information
- A scanned copy of the Process Authority letter, signed and dated—this will be uploaded in Section G

9.5 FAQs about filing a scheduled process

Can I file form 2541 while I am still waiting for my Process Authority letter?

- Yes. To file form 2541, you'll need information about your business and manufacturing location, but you won't need information specific to your process authority review yet. You won't have to enter that information until you file form 2541d,e,f, or g, which can be filed up to 60 days after form 2541.

If I change my container, will I have to get a new Process Authority letter and file a new scheduled process?

- Yes. Your Process Authority review is tied to your specific formula, production and packaging process (especially times and temperatures), package material and dimensions, and manufacturing location. If any of these things change, you'll need to request a new Process Authority letter. This usually, but not always, requires an entirely new Process Authority review process (in some cases, the letter can simply be updated). Then, the scheduled process would need to be re-filed using form 2541d,e,f, or g.

If want to make small changes to my formula for the next batch I manufacture based on customer feedback. Will I have to get a new Process Authority letter and file a new scheduled process?

- Yes. Your scheduled process is tied to your very specific formula, so it if changes at all, you'll need to request a new Process Authority letter. This usually, but not always, requires an entirely new Process Authority review process (in some cases, the letter can simply be updated). Then, the scheduled process would need to be re-filed using form 2541d,e,f, or g.

How many days may pass after I file form 2541 before I must file form 2541d,e,f, or g?

- You have a window of 60 days maximum after filing form 2541 to file the process-specific forms

What should I do if I have problems filing?

- The FDA has [extensive guides](#) and [instructions](#) for filing available online. [See more guidance documents here.](#) If you still encounter problems, you can email LACF@FDA.HHS.GOV



9.6 If you DO NOT need to file a scheduled process, determine if your product requires a HACCP plan instead

HACCP Plan (for Juice, Seafood, Dairy, Meat, and Poultry)

- A HACCP plan is required for most USDA-regulated foods and recommended for many FDA-regulated foods. USDA offers a [Guidebook for the Preparation of HACCP Plans](#) through its website and any seller wishing to prepare a HACCP should consult it for extensive details

9.7 If you DO NOT need to file a scheduled process OR write a HACCP plan, determine if your product would benefit instead from an Exemption Letter or a Letter of Guarantee

Some products do not require filing a scheduled process, but despite this the producer may be asked to acquire a Process Authority letter anyway

- Some reasons why this might happen are:
 - The co-manufacturer wants a safety review on record for liability reasons—this is common
 - An inspector is unfamiliar with the product or process, and wants a letter on record for liability reasons
 - The producer manufactures a legal, but poorly understood product that doesn't meet the requirements for needing a HACCP plan, and is tired of answering questions about it and wants to produce a document showing that their process has been verified (a classic example of this is small-batch tofu)
- In these cases, the best course of action is to get an Exemption Letter or a Letter of Guarantee—these are just like Process Authority letters except that they do not need to be filed with the FDA
 - Just like for a process authority letter, you will submit your formula, process, and any relevant test results to a process authority letter
 - That process authority will review your information and produce a letter verifying the efficacy of your process based on previous data and published research
 - However after this letter is distributed to you, you do not need to take any further action—simply keep this letter in your records. There is no need to file it with the FDA
 - Request an updated letter if anything changes about your formula, process, or target metrics

10. Manage Ongoing Compliance

10.1 Maintain periodic updates, renewals, etc.

Maintain business name

- Annually maintain your business name with the [Colorado Secretary of State](#) by submitting a renewal each year



10.2 Maintain required or recommended documents

Companion tool — FIC Compliance Documents Checklist. *The list below summarizes the key records. For the complete master list — every permit and document, each tagged Required / Recommended / Optional for both the Cottage Foods and inspected paths, marked with who is responsible, and linked to the exact regulation — use the companion FIC Compliance Documents Checklist (available free from the FIC; see §12.8).*

HACCP Plan if required (for juice, seafood, dairy, meat, and poultry or other USDA-regulated foods)

- A HACCP plan is required for most USDA-regulated foods and recommended for many FDA-regulated foods. A HACCP plan does not replace the documents required for FDA-regulated foods under 21 CFR 117 described below. USDA offers a [Guidebook for the Preparation of HACCP Plans](#) through its website and any seller wishing to prepare a HACCP should consult it for extensive details

Written Food Safety Plan

- Description of Product
- Statement of Ingredients
- Statement of Allergens
 - List all nine major allergens present. Sesame became the ninth major allergen effective January 1, 2023 under the [FASTER Act](#). The nine are: milk, eggs, fish, crustacean shellfish, tree nuts, peanuts, wheat, soybeans, and sesame.
- Process Flow Diagram
- Hazard Analysis
- Identification of Critical Control Points
- Identification of Preventative Controls (including, as needed)
 - Supply Chain Preventative Controls
 - Allergen Preventative Controls
 - Sanitation Preventative Controls
 - GMP Preventative Controls
 - Production and Process Preventative Controls

Hazard Analysis and Preventative Controls (note: this is not the same as a HACCP plan)

- Written hazard analysis (identifies and evaluates known or reasonably foreseeable hazards associated with the food, including biological, chemical, physical hazards) (required under [21 CFR 117](#), Subpart C)
- Written preventative controls plan (describes the chosen control measures to significantly minimize or prevent identified hazards, including supply-chain controls)
- Written procedures for process monitoring, verification, and validation of preventive controls.
- Records from monitoring activities (e.g., temperature logs, time records).
- Validation and verification documentation demonstrating preventive controls' effectiveness



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

- Where applicable, records documenting the establishment and implementation of temperature controls
- Where applicable, records of monitoring frequency and parameters to assure consistent performance of temperature controls
- Documentation of corrective actions taken when there is a loss of temperature control that may impact food safety
- Actions to correct the problem and prevent recurrence
- Evaluation of all affected food for safety
- Record of actions to prevent adulterated food from entering commerce if safety cannot be ensured
- Written recall plan including steps to do and responsibility for: notification of consignees and public, disposal of affected food, effectiveness checks
- Records of all actions taken during a recall, where applicable
 - If a copacker is used, responsibility for these documents is shared between the copacker and the brand, or may depend on their specific arrangement

Written Supply Chain Program

- Formal written assurances/statements from the supplier confirming compliance with applicable FDA or comparable food safety regulations
- Statements that supplier farms are covered or exempt under specific regulations such as part 112 or part 118, if applicable
- Documentation showing the approval process of suppliers before first use and on an annual basis
- Supplier approval and verification documentation including audits, inspections, testing, corrective actions, and supplier written assurances
- Records showing ongoing evaluation and re-approval of suppliers
- Documentation of regular reviews of supplier food safety records
- Records of findings from those reviews and any corrective actions
 - If a copacker is used, responsibility for these documents is shared between the copacker and the brand, or may depend on their specific arrangement

SOPs for Receiving and Storage of Raw Materials

- Written procedures for receiving raw materials and ingredients
- Documentation that all ingredients meet the requirements of 21 CFR 101.14(b) for food additives, GRAS status, or prior sanctions
- Document compliance status of each ingredient with FDA regulations
 - If you are producing in a copacker that handles sourcing and raw materials, the facility is responsible for the above documentation

Allergen Control and Evidence of Labeling Compliance

- Procedures for allergen control and cross-contact prevention



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

- Documentation of allergen labeling compliance on finished product labels (for labeling exemptions and requirements)
- Copies of all labels used on products
- Documentation supporting compliance with nutrition labeling regulations or exemption claims
- Documents supporting any health claims and compiled scientific evidence supporting any health claims based on the totality of publicly available scientific data. Demonstrate significant scientific agreement supporting the claim
 - If a copacker is used, responsibility for these documents is shared between the copacker and the brand, or may depend on their specific arrangement

Records of Basic Sanitation and Good Manufacturing Practices (GMPs)

- Written cleaning and sanitation procedures for equipment, utensils, and food-contact surfaces
- Cleaning and sanitation logs documenting the date, time, areas/equipment cleaned, chemicals used, personnel performing the activity, and verification of cleaning effectiveness
- Pest control program documentation, including inspection logs, records of pest sightings, pesticide use, and corrective actions taken to prevent contamination
- Written hygiene and sanitation policies and procedures for employees and visitors
- Records of employee hygiene training, including dates, training topics, attendees, and evidence of comprehension or compliance
- Written procedures for manufacturing and operations (SOPs)
- Dates batch made, initials of responsible party for each verification step, QC review
- Written procedures for laboratory or analysis operations (SOPs)
- Instrument calibration methods and logs
 - If you are producing in a copacker that manufactures and packages the product, the facility is responsible for all the above documentation

Production and Process Controls

- Records of product testing programs including sampling plans, test results, laboratory identification, corrective actions for failed tests.
 - Environmental monitoring records if applicable (e.g., pathogens in ready-to-eat food environments)
 - Allergen testing if applicable
 - If you are producing in a copacker that manufactures and packages the product, the facility is responsible for all the above documentation
- Process documents for manufacture of any food/beverage product
 - Process Flow Diagram (same as diagram used in Food Safety Plan)
 - SOP for product manufacture
 - Critical limits identified in manufacturing SOP (including time, temperature, pH, etc.), if any
 - Logs of processing and production records



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

- If you are producing in a copacker that manufactures and packages the product, the facility is responsible for all the above documentation
- Process documents specific to acidified foods
 - Records identifying initial distribution of finished product to facilitate segregation of specific lots if contaminated or unfit
 - Processing and production records including product codes, dates, container sizes, product identity to permit public health hazard evaluation
 - Logs of processing and production records with adherence to scheduled processes, including pH and other critical factors
 - Records of deviations from scheduled processes affecting safety or public health and disposition of affected product portions
 - If you are producing in a copacker that manufactures and packages the product, the facility is responsible for all the above documentation
 - Process Authority letter required—getting this document is your responsibility, even if you work with a co-packer
- Process documents specific to low-acid canned foods (LACF)
 - Records identifying initial distribution of finished product to facilitate segregation of specific lots if contaminated or unfit
 - Processing and production records including product codes, dates, container sizes, product identity to permit public health hazard evaluation
 - Logs of processing and production records with adherence to scheduled processes, including pH and other critical factors
 - Records of deviations from scheduled processes affecting safety or public health and disposition of affected product portions
 - If you are producing in a copacker that manufactures and packages the product, the facility is responsible for all the above documentation
 - Process Authority letter required—getting this document is your responsibility, even if you work with a co-packer
- Process documents specific to fermented foods, carbonated beverages, water-activity-controlled foods, and some raw agricultural products
 - Documentation of corrective actions taken in response to identified non-conformances, deviations, or hazards
 - If you are producing in a copacker that manufactures and packages the product, the facility is responsible for all the above documentation
 - Process Authority letter is not required by the FDA, but may be requested by your co-packer. For many of these products the result will be an Exemption Letter after Process Authority review—getting this document is your responsibility, even if you work with a co-packer



Recall Plan and Traceability Documents

- Reports of consumer complaints related to product safety
- Documentation of steps taken in response to complaints or recalls
- Names and contact information of suppliers
- Purchase orders and contracts
- Invoices and delivery receipts for raw materials and ingredients
- Lot/batch numbers of raw materials/ingredients
- Certificates of analysis or guarantees provided by suppliers
- Documentation of supplier compliance with food safety laws if applicable
- Log showing dates and times materials were received, quantity and condition upon receipt, employee receiving and verifying materials
- Tracking of ingredient lots while in storage
- Storage conditions and monitoring records (temperature, humidity)
- Batch or lot codes used in production and processing steps, times, and conditions
- Monitoring records during processing (e.g., pH, temperature measurements)
- Records of any deviations and corrective actions taken
- Shipments records with product name, lot/batch numbers, quantity, dates and times, and destination
- Shipping documentation for traceability and recall purpose
 - If you are producing in a copacker that manufactures and packages the product, the facility will have a universal recall plan for all the products they work with, but you as a producer are also required to have a written recall plan that involves coordinating with the co-manufacturer and notifying your consumers of the recall

Employee Training Records

- Records documenting training provided to employees including names of employees trained, dates of training, and type of training
- Training records must support the qualifications of supervisory personnel overseeing compliance with food safety requirements.
- Qualifications for those in a supervisory role must be documented and appropriate to the position
- Where applicable, Food Safety Manager certification for supervisory employee on file
- Where applicable, Better Process Control School certification for supervisory employee on file
 - If you are producing in a copacker that manufactures and packages the product, the facility is responsible for this documentation

Exemption Records, where applicable

- Registration as a Cottage Foods producer
- Detailed list and description of all products sold

- Ingredient specs or COA or other sourcing documents showing ingredients meet food safety standards
- Sales receipts
- Records of sales volumes
- Where required, records on file of food handler trainings required by state/local health departments
- Copies of labels on file that are compliant with state and local Cottage Foods labeling regulations (differ by area)
- Purchase records for raw materials, components, ingredients, etc.
- Records of inventory management
- Employee files
- Payroll records

Certification Records

- Records of certifications for ingredients (Organic, gluten-free, non-GMO, etc.)
- Records of testing that would support these certifications or statements
- Records of facility compliance with certification requirements
 - If a copacker is used, responsibility for these documents is shared between the copacker and the brand, or may depend on their specific arrangement and the specifics of the type of certification issued and how it is held.

10.3 Other compliance considerations

Labeling Compliance

- All FDA- or USDA-regulated retail foods must have FDA-compliant labels (on containers directly holding food), labeling (on websites or promotional materials), and packaging. All regulations can be found in [21 CFR chapter 1 subpart B sub chapter 101](#). The CSU Spur Food Innovation Center can help with label review. Federal food-labeling rules are in [21 CFR 101](#).

Required label elements

Every FDA-regulated retail food label must include the elements below. The statement of identity and net quantity go on the front of the package (the Principal Display Panel); the rest may go on the information panel (usually the right of the front).

Element	What it must show	Reg.
Statement of identity	The common or usual name of the food, prominent on the front panel	21 CFR 101.3
Net quantity of contents	The amount of food by weight, volume, or count, in the lower 30% of the front panel	21 CFR 101.7
Nutrition Facts panel	FDA-format nutrition panel — unless you qualify for a small-business	21 CFR 101.9



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

Element	What it must show	Reg.
	exemption (below)	
Ingredient list	Every ingredient by its common name, in descending order by weight	21 CFR 101.4
Allergen “Contains” statement	A “Contains” line declaring any of the nine major allergens present	FALCPA
Name & place of business	Name and address of the manufacturer, packer, or distributor	21 CFR 101.5

Labels may not carry false or misleading claims. Nutrient-content claims (e.g., “low fat”) and health claims are separately regulated and void the nutrition-labeling exemptions below. See the [FDA Food Labeling Guide](#) for full detail.

- Small businesses may be exempt from the Nutrition Facts panel. The exemption is lost if your label makes a nutrient-content or health claim:
 - Small-business exemption ([21 CFR 101.9\(j\)\(1\)](#)): no Nutrition Facts panel is required, and no filing is needed, if your annual gross sales are \$500,000 or less, or your annual sales of food to consumers are \$50,000 or less.
 - Low-volume exemption (21 CFR 101.9(j)(18)): no panel is required if you employ fewer than 100 full-time-equivalent people and sell fewer than 100,000 units of that product in the U.S. per year — but you must [file a short notice with the FDA](#) each year to claim it.
- The FIC can build FDA-compliant Nutrition Facts panels and review your full label (see §11).

Insurance Compliance

- Insurance documents are not part of the federally mandated compliance documents, because it is mandated by state and local agencies instead of federal
- Nevertheless insurance paperwork should be kept available at all times in case of inspection or should be made available upon request

Retail and Point-of Sale Compliance

- Vendors may have specific and unique requirements on packaging size, unit numbers, shelf-life of products, labeling, etc.
- Sale at most retailers requires purchase and use of unique UPC codes
 - Note: never purchase recycled UPC codes as some retailers will reject product on the basis of difficulty reading them

Colorado Packaging Compliance — Extended Producer Responsibility (EPR)

- Since January 1, 2026, Colorado’s Producer Responsibility Program requires producers of packaging, paper products, and food-service ware sold in Colorado to register and participate through the [Circular Action Alliance](#) and report and pay dues on the “covered materials” they use (established by [HB22-1355](#)).
- Small-producer exemption: producers with less than \$5 million in annual gross revenue, or who use less than one ton of covered materials per year, are exempt (the threshold is adjusted annually). Confirm your status with [CDPHE’s EPR program](#) before you assume you are exempt.



11. Relevant Services Provided By The CSU Spur Food Innovation Center

The FIC offers the services below to help you develop, test, and launch your product. Prices are 2026 rates and subject to change; turnaround times assume all client information and payment are in hand. The first 30-minute consultation is free.

Service	Cost (2026)	Typical turnaround
Initial consultation	Free (first 30 min)	—
Consulting / product & process development	\$175/hr	By appointment
Equilibrium pH test	\$45/sample	~7 days
Water activity test	\$80/sample	~7 days
Brix / Moisture	\$35 / \$45 per sample	~7 days
Gluten / Titratable acidity	\$80/sample	~7 days
Process Authority letter	\$200/letter	~14 days
PA filing assistance	\$200/letter	~14 days
Nutrition Facts Panel (calculated)	\$250/label	~14 days (7 for updates)
Label review	\$300/label	By appointment
Shelf-life testing	From \$4,000	Project-based
DIY shelf-life guide	\$200	—
Co-development	\$700 half day / \$1,300 full day	Project-based
Minimum Viable Product (MVP)	From \$8,000	6–8 months
Commissary kitchen — shared use	\$25/hr + \$125/mo (\$15 + \$50 for 80216 residents)	—
Commissary kitchen — exclusive use	\$125/hr (\$150 weekends)	—

Prices current for 2026 and subject to change; see agsci.colostate.edu/fic. Contact Mike Gabel, Director — foodinnovation@colostate.edu · 970-567-7983.

11.1 Product Development

- Scalable formulas and recipe scaling assistance
- Full-service product development
- Reformulation
- Product troubleshooting
- Co-development (brand owner working alongside food scientists)

11.2 Food Analysis

- pH
- Water Activity
- Brix
- Moisture Analysis

- Salinity
- Conductivity
- Titratable Acidity
- Gluten testing

11.3 Process Authority Services

- Process Authority Letters
- Exemption Letters
- Letters of Guarantee

11.4 HACCP Plan Creation or Advising

- HACCP Plan Creation
- HACCP Plan Review

11.5 Nutrition Facts Panels (NFP)

- Creation of FDA-compliant NFPs for all packaging sizes and formats

11.6 Label Review

- Audit for FDA-compliant labeling and packaging at any packaging level

11.7 Shelf-Life Testing

- Real-time testing
- Accelerated testing
- Stress testing
- DIY shelf-life testing consultation and materials

11.8 Commissary Kitchen Space

- [Commissary Use Request](#)

11.9 Sensory Testing Services

- Consumer Panels
- All Types of Sensory Testing from Participant Database
- Data Analysis Report Provided

11.10 Consulting and Advice

- Free 30 minutes consulting
- Consulting by 30-minute or 60-minute appointments
- Consulting blocks to be used as needed



11.11 Free Resources by Request

A full list of the free tools, calculators, and templates available by request is in Section 12.8 (“Resources available from the CSU Spur FIC upon request”). Email foodinnovation@colostate.edu to request any of them.

11.12 Contact Information

- Colorado State University Spur Food Innovation Center
- 4780 National Western Dr. Denver CO 80216, Terra Building
- You may contact us to book free 30 minutes consulting, request services, look up pricing, explore our spaces, and find out what equipment we have available through [our website](#) or email us at foodinnovation@colostate.edu

12. Other Resources And Additional Support

12.1 Basic Links, Resources, Agencies

- [FDA—Human Foods Program](#)
- [USDA](#)
- [FSMA](#) (full text, searchable)
- [IRS](#)
- [CDPHE Food Safety and Licensing](#)
- [CO Dept of Ag CO](#)
- [CO Secretary of State](#)
- [City and County of Denver](#)
- [Colorado Retail Foods Resources and Regulations](#)
- [eCFR 21 Chapter 1 Subchapter B](#) (navigable and searchable)
- [Nutrition Labeling Guide](#) (FDA’s guidance for industry)
- [GS1 for UPC Bar Codes](#)

12.2 Commissary Kitchen Resources

- [Commissary Operation Guide](#)
- [Jefferson County CO Commissary FAQs](#)
- [Jefferson County CO Example Commissary Contract](#)
- [Boulder County CO Example Commissary Contract](#)
- [City and County of Denver CO Affidavit of Commissary](#)

12.3 Cottage Foods Resources

- [Cottage Foods Act](#) (from CDPHE) and Related Statutes (state of Colorado)



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

- [Cottage Foods Laws by State \(map and chart\)](#)
- [Cottage Foods FAQ in Colorado](#)
- [Cottage Foods Checklist](#)
- [Labeling Guidance for Cottage Foods](#)

12.4 Advising, Mentorship, Resources, Networking

National Small Business Association

- New entrepreneur guides
- Advocacy resources
- Toolbox of corporate partners
- Training and direct business mentorship
- [Colorado Restaurant Association](#)
- [Colorado Farm and Food Alliance](#)
- [Colorado Farm to Market](#)
- [Naturally Colorado](#)
- [Startup CPG](#)
- [Minority Business Circle](#)
- [Veterans Business Outreach Center](#)

12.5 Financial Assistance (Grants, Loans, Prizes, Incentives)

- [MONA Ventures](#) (a partnership to deliver zero-interest capital to entrepreneurs by matching them with grants and other sources of capital)
- [National Small Business Association](#) Loans
- [Venture Capital](#) (NSBA-assisted)
- [Disaster-recovery or other assistance programs](#)

Colorado Office of Economic Development

- Offers grants and loans
- [Northwest and Rocky Mountain Region Food Business Builder Program Grants](#)
- [Colorado Community Food Access Program](#) — equipment tax credit for small food retailers and small family farms expanding access to healthy food (the earlier Recovery & Resilience grant round has closed)
- [Startup Colorado Entrepreneur Grant](#)

Farm to Food Accelerator Program (Colorado, Nevada, Oregon, California, Florida)

- Provides no-cost technical assistance, education, and networking
- [Rural Jump-Start Program](#) (CO Office of Economic Development)
- [Colorado Opportunity Zone Program](#) (CO Office of Economic Development)



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

- [Naturally Colorado's Naturally Rising Pitch Competition](#)
- [Small Business Loans](#)
- [USDA Value-Added Producer Grants](#)
- [Amber Grants](#) for female-owned food and beverage businesses
- [TIE Women](#) Global Pitch Competition
- [The Watson Institute for Environmental Sustainability Entrepreneurship Program](#)
- [The Awesome Foundation](#) monthly award
- [Small Business Hero Grant](#)
- [Cartier Women's Initiative](#) for women-owned businesses
- [Streets Global Award](#) for new businesses (first 1-5 years of operation) in Hospitality or Tourism
- Amazon's Black Business Accelerator
- [Progressive Driving Small Business Forward Award](#) towards the purchase of a business vehicle
- [SeedSpot Emerging Brand Accelerator](#)
- [ZenBusiness Incentives](#) (launch fees covered for moms)
- [HerSuiteSpot Micro Grants](#) for businesses owned by women of color
- [James Beard Women Entrepreneurial Leadership Program](#) for women-owned or co-owned brick-and-mortar food businesses
- [Honeycomb Celebration Small Business Grant](#)
- [Warrior Rising Grant](#) for veterans in any stage of business development, from ideation to operations

12.6 Certification Information and Resources

USDA Organic

- [eCFR 21 Chapter 1 Subchapter B Subpart 7](#): National Organic Program (full text, searchable)
- Northeast Organic Farming Association
- Massachusetts Organic Certifiers
- Bay State Organic
- [CCOF](#)
- [Fair Trade](#)

Gluten-Free

- The food must contain less than 20 ppm gluten (demonstrated by lab testing)
- The food must not contain wheat, barley, or rye, or any crossbreeds or hybrids of these
- Unless the grains have been processed such that, when used as an ingredient, the ingredient contains less than 20 ppm gluten

Allergen-Free

- There is no official FDA standard for this label, but there are various third-party certification programs



- Requires documentation and a facilities plan

Non-GMO

- The FDA does not have a formal definition of non-GMO, but there are various third-party certification programs
- Requires adequate supporting evidence such as supply chain documentation, but no testing is required

12.7 Food Safety Resources

Potentially Hazardous Foods (PHF) requiring Time/Temperature Control for Safety (TCS)

- [PHF Foods 101](#)
- [Evaluation and Definition of Potentially Hazardous Foods](#)
- [Tables A and B](#) for determining if a food is Potentially Hazardous

pH Basics

- [Acid and low-acid canned food guidance from FDA](#)
- [Decision tree questions](#) to distinguish Acid foods, Acidified Foods, and Low-Acid Foods (or beverages)
- [Buying a pH meter](#)
- [The Apera AI209 pH20](#) is a pretty good meter for use at home as you are developing your formula, if you store and calibrate it as instructed
- [The Oakton pH spear](#) is a better meter for regular use as you begin commercial production, if you store and calibrate it as instructed
- [Using and Calibrating a pH Meter](#)

Water Activity Basics

- Water activity is not something you can test at home; samples must be sent to a lab for testing. Water activity is not the same as moisture content.
- [FDA water activity compliance](#)
- [Water Activity 101](#)

Temperature and Thermometer Basics

- [How to calibrate a thermometer](#)

12.8 Resources available from the CSU Spur FIC upon request

(foodinnovation@colostate.edu)

- FIC Product Commercialization Roadmap — a visual map from idea to market (free)
- FIC Pricing & Market Workbook — competitor-price survey, cost of goods, and suggested price versus the shelf (free)



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

- FIC Break-Even & MOQ Calculator — how many units you must sell to cover your costs, plus a minimum-order check (free)
- FIC Recipe & Formula Scaling Workbook — turn a kitchen recipe into grams and a weighted formula, then scale to any batch or container count (free)
- FIC Compliance Documents Checklist (free) — a complete, regulation-linked master list of every permit, registration, and record, each tagged Required / Recommended / Optional for both the Cottage Foods and FDA-inspected paths and cited to the CFR
- FIC Nutrition Facts (NFP) Calculator — estimate your panel with FDA rounding and %DV, serving size (RACC), label format, and your ingredient statement (free)
- Searchable list of co-manufacturers, not exhaustive (free)
- List of ingredient suppliers, not exhaustive (free)
- Resource list of labs, food lawyers, packaging suppliers, etc. (free)
- 30 minutes consulting to ask any questions (free for 30 minutes—after that we can answer brief emails, otherwise consulting is \$175/hour (2026 rate))
- FIC DIY Shelf-Life Study — taste-panel shelf-life packet. Materials are free; add \$200 for guidance and results analysis, if needed.
- FIC Label Requirements & Allergen Checklist — every required label element plus your allergen “Contains” statement (free)
- FIC Process Authority Screener — enter pH and water activity to screen whether you need a Process Authority (free)
- FIC Co-Packer Readiness Scorecard — check whether you are ready to hand off to a co-manufacturer and compare candidates (free)



Appendix A — Glossary of Terms & Acronyms

Term	Definition
Acidified food	A low-acid food with acid added to reach a finished equilibrium pH of 4.6 or below and water activity above 0.85 (e.g., hot sauce, dressings). Regulated under 21 CFR 114.
aw (water activity)	A measure of the free water available to support microbial growth (0–1.0). Not the same as moisture content; must be lab-tested.
BPCS	Better Process Control School — required training for anyone supervising production of acidified or low-acid canned foods.
CDPHE	Colorado Department of Public Health and Environment — the state agency overseeing food safety and licensing.
CFR	Code of Federal Regulations. FDA food rules are in Title 21; USDA meat/poultry rules in Title 9.
COGS	Cost of Goods Sold — the total cost to produce one unit of your product.
Co-manufacturer / Co-packer	A contract facility that manufactures and packages your product for you.
Commissary / Shared kitchen	A licensed, inspected kitchen rented by multiple producers who do their own production.
Cottage Foods	State laws allowing certain low-risk foods to be made at home and sold directly to consumers without inspection.
C.R.S.	Colorado Revised Statutes — Colorado state law (e.g., the Cottage Foods Act at C.R.S. § 25-4-1614).
DUNS number	A 9-digit Dun & Bradstreet identifier used by the FDA as your facility's Unique Facility Identifier (UFI).
EIN / TIN	Employer / Tax Identification Number issued by the IRS for your business.
FCE	Food Canning Establishment registration number, required for acidified/LACF producers.
FDA	U.S. Food and Drug Administration — regulates most packaged foods.
FFR	Food Facility Registration with the FDA (Form 3537), renewed every even-numbered year.
FSIS	Food Safety and Inspection Service — the USDA branch that inspects meat, poultry, and egg products.
FSMA	Food Safety Modernization Act — the federal law behind modern preventive-controls requirements (21 CFR 117).
GMP	Good Manufacturing Practices — baseline sanitation and process controls for food facilities.



FOOD INNOVATION CENTER
COLORADO STATE UNIVERSITY

Term	Definition
HACCP	Hazard Analysis and Critical Control Points — a food-safety plan required for juice, seafood, and USDA-regulated foods.
LACF	Low-Acid Canned Food — a food with equilibrium pH above 4.6 and water activity above 0.85, requiring pressure processing (21 CFR 113).
NFP	Nutrition Facts Panel — the FDA-required nutrition label on packaged foods.
PA (Process Authority)	A qualified expert who reviews and approves your process for acidified/LACF or other higher-risk foods.
pH	A measure of acidity (0–14). A pH of 4.6 or below is the key threshold for acidified-food safety.
PHF / TCS	Potentially Hazardous Food / a food requiring Time-Temperature Control for Safety.
Scheduled Process	The FDA-filed steps and target metrics (pH, time, temperature) for safely producing an acidified or LACF product.
Shelf-stable	Safe to store at room temperature without refrigeration.
UFI	Unique Facility Identifier required for FDA facility registration; the FDA currently accepts the DUNS number.
USDA	U.S. Department of Agriculture — regulates meat, poultry, and certain egg products.



Appendix B — Regulatory References

Key regulations referenced in this guide. Federal rules link to the live, always-current eCFR; Colorado statutes and bills link to the state legislature.

Regulation	What it covers
21 CFR 101	Food labeling — Nutrition Facts, ingredient lists, allergen declarations
21 CFR 113	Thermally processed low-acid canned foods (LACF)
21 CFR 114	Acidified foods
21 CFR 117	Current GMPs, hazard analysis & risk-based preventive controls (FSMA)
21 CFR 120	HACCP — juice
21 CFR 123	HACCP — fish & fishery products
9 CFR (Title 9)	USDA FSIS — meat, poultry & egg products
7 CFR 205	USDA National Organic Program
C.R.S. § 25-4-1614	Colorado Cottage Foods Act (home-kitchen exemption; \$10,000/product cap)
HB26-1033 (2026)	“Tamale Act” — cottage foods expansion to TTC/meat foods, effective Jan 1, 2027
FSMA	Food Safety Modernization Act — full text
FASTER Act	Sesame designated the 9th major food allergen (Jan 1, 2023)