

Voluntary Report – Voluntary - Public Distribution

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Report Name: Implementation Delayed for Third Phase of Front-of-Pack Labeling Regulation

Country: Mexico

Post: Mexico City

Report Category: FAIRS Subject Report

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Report Highlights:

The Government of Mexico has delayed the implementation of the third phase of its front-of-package labeling regulation, also known as NOM-51. The third phase was scheduled to begin on September 30, 2025, but has been postponed several times and is now set to take effect on January 1, 2028. NOM-51, which impacts prepackaged foods and non-alcoholic beverages, is being implemented in three progressively stricter phases. The first phase began on October 1, 2020, and introduced mandatory front-of-package labels on products that exceed specific thresholds for calories, sodium, sugar, saturated fats, and trans-fats. The second phase, which began on October 1, 2023, implemented more restrictive criteria for added sugars, fats, and sodium.

Delay of Implementation of Third Phase of Front-of-Package Labeling Requirements

On July 31, 2025, Mexico's Official Gazette of the Federation (DOF) published a second [agreement](#) between the Secretary of Economy and the Federal Committee for Protection from Sanitary Risks (COFEPRIS), postponing the implementation period for the third phase of its front-of-package labeling (FOPL) requirements. This agreement establishes that the third phase will go into force on January 1, 2028, and consequently, the second phase remains in force until December 31, 2027. The third phase will introduce stricter requirements for labeling as established in the Second Transitory Provision of the Amendment to the Mexican Official Standard [NOM-051-SCFI/SSA1-2010](#), also known as NOM-51 (see GAIN [MX2023-0051](#)).

Brief Overview of New Requirements under Phase Three

Under phase three of NOM-51, the nutritional content requirements for when octagonal warning labels are required to be included on labels for prepackaged foods and non-alcoholic beverages will become stricter, as outlined in Table 1 below. The third phase of implementation will also require octagonal warning labels when **ingredients** in the prepackaged products contain excess sugars, fats, and sodium. For products intended to be reconstituted or that require preparation before consumption, the supplemental nutritional information must be declared based on the contents of energy, free sugars, saturated fats, trans fats (except those naturally present in dairy and meat products in the case of trans fats), or sodium **in the product as consumed**, in accordance with the instructions indicated on the label.

Table 1: Nutritional Profiles that Trigger Required Use of Octagonal Labels under Phase Three of FOPL Implementation

	Energy	Sugars	Saturated fats	Trans fats	Sodium
Solids per 100 g of product	≥ 275 total kcal	≥ 10% of total energy from free sugars	≥ 10% of total energy from saturated fats	≥ 1% of total energy from trans fats	≥ 1 mg sodium per kcal or ≥ 300 mg
Liquids per 100 mL of product	≥ 70 total kcal or ≥ 8 kcal from free sugars*				Non-caloric beverages ≥ 45 mg sodium
Legend to be used	EXCESS CALORIES	EXCESS SUGARS	EXCESS SATURATED FATS	EXCESS TRANS FATS	EXCESS SODIUM

Source: [March 2020 Modification to the NOM-51](#)

*Free sugars are defined under NOM-51 as: "Available monosaccharides and disaccharides added to foods and non-alcoholic beverages by the manufacturer, plus sugars that are naturally present in honey, syrups, and fruit or vegetable juices"

Compliance with the FOPL rules is mandatory and Post recommends that U.S. exporters consider the following:

1. Pay attention to the compliance dates, as the standards must be fully met by the due date.
2. Note that commercial information on the label must be reviewed by an authorized verification unit. The verification units will give an official opinion called “Constancia,” stating that the product complies with the standard.
3. Identify a reliable importer for guidance throughout the NOM-51 process.

If you need any further information, please contact our office at: Agmexico@usda.gov

Attachments:

No Attachments.