

Date, 22 April 2005

Docket No. 2004N-0463

Dear Docket Clerk,

Thank you for this opportunity to comment on proposed FDA changes to food labeling procedures. While it may not be the panacea to stop the rising rate of obesity in America, changing requirements for food labeling is an important part of the overall solution.

I support the idea of placing the calorie content in food on the front of the product. This new prominence emphasizes to people the importance of the findings of the Obesity Working Group (OWG), that “calories count¹.” This raises consumer awareness of the importance of calories, and provides consumers with new advantages.

The first advantage is by providing consumers with a simpler, more efficient way to shop and possibly in deciding what to eat. With a prominent calorie listing on the front of a product, it will further enable consumers to do a quick comparison between products – much like consumers do with price tags. For individuals who normally do not compare the nutritional value between products, for reasons such as time or not understanding nutritional facts panel, this directly provides these consumers with another option. Consumers at grocery stores can quickly scan all of the available options by comparing calorie labels between brands, making comparisons simpler and quicker. Consumers would have an easier time understanding the caloric content of the products their purchasing.

Besides giving consumers an easier way to compare, it also prevents calories from blending in with the other nutritional information. Items on the front of the label are what consumers see first. On the back of the product, it is very easy for one to simply scan over all of the nutritional listings and completely miss the calorie count. When it is on front, it becomes much easier for one to notice and consider.

Additionally, the number of calories means little at less referenced along with the serving size. Putting the calorie count alongside the number of serving sizes in the container properly puts the calories in context. A potential display could read:

100 calories per serving
4 servings total

According to the qualitative analysis done by the FDA in 2003, some consumers have a difficult time understanding serving sizes¹. This formula directly provides the relationship between calories and serving sizes in a product, where on back it is easier to miss. This formula also solves the problem of whether to display the total calories in a product or the number of calories per serving size.

Perhaps the first step to raise awareness is requiring a color contrast to the background color of the product's packaging. The advantage of requiring a color contrast as compared to one overall color for all product labeling avoids the visual prominence of the label from blending in with similar color backgrounds. Additionally, an increased font size aids both visual prominence and individuals with decreased visual acuity.

Because of the wide range of products and the types of packaging used to advertise these products, an additional option is combining any changes in font size with symbols or easily recognizable images. Symbols have the added benefit of communicating to people who have decreased literacy skills and crosses language barriers. This promotes easy recognition, especially if the background color of the label may change according to the product.

As far as the other nutritional information provided in labels, such as percent daily value for total calories or the number of calories from fat, is helpful information best located on the back of the nutrition panel. Unfortunately, this added information may only apply to certain people, who attempt to consume the recommended daily allowance for calories. Regardless, knowing percent daily value for total calories is still useful information,

because it helps put the amount of calories consumed from one product into a rough estimate of what one should consume daily.

As far as the calories from fat, this information can be misleading to individuals overly focused on the fat content of the product. Many individuals fail to realize that just because a product is low in fat does not mean that it will help them lose weight. The OWG states clearly in their report that weight loss comes from burning more calories than what one consumes¹. Achieving a proper caloric balance is a basic principle of weight loss. Nevertheless, it remains useful to know what nutrients are in a product, because it serves as an important reference. While there are some disadvantages to additional information, it is important to design nutritional labels so that as many people as possible are capable of understanding the information but at the same time detailed enough to aid people who seeking more comprehensive information.

Finally, in answer to the question of the effect on business, making an issue important to consumers makes the issue important for business. While some may not change their marketing strategy, many businesses would have a greater motivation to make their products healthier knowing more consumers would take the time to compare their products based on caloric content. With this new motivation, it is not hard to see it leading towards businesses creating products with smaller portions or reformulated to include less calories.

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REFERENCES

1. Report of the Obesity Working Group, "Calories Count," March 12, 2004, Available at: <http://www.cfsan.fda.gov/dms/owg-toc.html>.