



November 12, 2007

Division of Dockets Management (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane  
Room 1061  
Rockville, MD 20852

**FR Docket No. 2007N-0277 Food and Drug Administration; Food Labeling: Use of Symbols to Communicate Nutrition Information, Consideration of Consumer Studies and Nutritional Criteria; Public Hearing; Request for Comments**

Dear Sir or Madam,

The Nutrient Rich Foods Coalition (NRFC) appreciates the opportunity to offer comments on the use of symbols to communicate nutrition information to consumers and how to implement such programs to make it most meaningful for consumers. The NRFC commends the Food and Drug Administration for its efforts to understand consumer attitudes toward nutrition symbols, how consumers use symbols on food packages to make nutritious food choices and what information consumers find most useful.

The NRFC is a partnership that brings together leading scientific researchers, communications experts and agricultural commodities\* representing the five basic *MyPyramid* food groups. We are dedicated to working with scientific researchers and health professionals to educate consumers on the complete nutrient package of foods and beverages and to help Americans “get the most nutrition from their calories<sup>1</sup>” as recommended by the 2005 *Dietary Guidelines for Americans* and *MyPyramid*. The NRFC has been working for over four years to develop and communicate science-based, consumer-driven messages about nutrient density to consumers. Our comments will address questions pertaining to Issue 2 regarding research on how symbol programs are understood by consumers in the Federal Register notice Docket No. 2007N-0277 – Food Labeling: Use of Symbols to Communicate Nutrition Information, Consideration of Consumer Studies and Nutritional Criteria published July 20, 2007.

We believe it is vital that any symbol program address the looming nutrition crisis – that the US population is increasingly overfed yet undernourished. The 2005 *Dietary Guidelines for Americans* state, “Many Americans consume more calories than they need without meeting recommended intakes for a number of nutrients. This circumstance means that most people need

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\* Members of the NRFC include California Kiwifruit Commission, California Avocado Commission, California Strawberry Commission, Egg Nutrition Center, Florida Department of Citrus, Grain Foods Foundation, The Beef Checkoff Program through the National Cattlemen’s Beef Association, National Dairy Council, National Pork Board, United States Potato Board, Wheat Foods Council and Wild Blueberry Association of North America.

to choose meals and snacks that are high in nutrients but low to moderate in energy content; that is, meeting nutrient recommendations must go hand in hand with keeping calories under control”<sup>2</sup>.

**The NRFC believes a unified front-of-pack nutrition symbol *could* be a useful tool in communicating the nutrient content of foods, if it is science-based and consumer tested. Additionally, the Coalition believes any unified symbol program should incorporate the concept of nutrient density.** This approach will allow consumers to make more healthful choices by selecting foods that contain more nutrients per calorie. For programs to deliver on stated public health goals of helping consumers get more nutrition from their calories, NRFC strongly believes a front-of-pack symbol must:

- **be based on the complete nutrient package, and help Americans build healthier diets;**
- **provide positive, *how-to* information for consumers**
- **work in harmony with the *Dietary Guidelines for Americans* and *MyPyramid***

**Any standardized front-of-pack nutrition symbol should be based on the complete nutrient package, and help Americans build healthier diets.** As stated, public health nutritionists are concerned that we have become an overfed, yet undernourished nation<sup>3</sup> and that high energy-, low nutrient-dense foods are eroding the nutrient density of the American diet. The NRFC philosophy has been that healthful foods should be defined by the complete nutrient package, rather than exclusively by the absence of problematic ingredients such as fat, sugar, and sodium. Any on-pack labeling system should provide complete information about the nutrient content of foods emphasizing *both* nutrients that are known to be beneficial to health and nutrients to limit to reflect current recommendations in the 2005 *Dietary Guidelines for Americans* and *MyPyramid*, as well as to deliver on the FDA Obesity Working Group (OWG) goal to outline an action plan ... *to help consumers lead healthier lives through better nutrition*<sup>4</sup>.

Tools at point of purchase, such as the food label, have the potential to help consumers make the best food choices possible. But, these nutrition education tools need to link calories and nutrients together rather than address them in isolation. Additionally, food labels need to tell consumers what nutrients the food *does* contribute in addition to what it *does not* contribute to help build more healthful diets. If consumers are unaware of what nutrients a food or food group contributes, they will be unable to effectively build healthful diets.

Consumers believe the benefit of being educated about nutrition is the opportunity to have a better quality of life and live longer<sup>5</sup>. Research shows that label information that provides consumers a more complete nutrition story is preferred and will help consumers make nutrient-dense food choices<sup>6</sup>. Consumers generally want food labels that are easy to use and that easily fit into their lives<sup>7</sup>. Research indicates on-pack symbol programs that make consumers more aware of the nutrient content of products are valuable because they can help them make informed decisions about food and beverage choices<sup>8</sup>.

**Symbol programs must provide Americans with positive, motivating, *how to* messages.**

It has been known for a long time what constitutes high quality diets. But, consumer research consistently shows it takes more than knowledge to motivate change<sup>9</sup>. Collectively we have an opportunity to help get Americans on the road to good health. It is essential to engage Americans through positive, motivating messages to help them build a quality diet.

Research shows consumers respond more favorably and are more likely to make behavior modifications with positive and empowering nutrition messages<sup>10</sup>. They prefer specific information to vague generalities. In short, consumers want to know what to do, how to do it and why<sup>11</sup>. They welcome visual tips that make the selection of nutrient-dense foods easy, such as icons that show the positive nutrients a food provides, along with nutrients they need to limit in their diet. Any system implemented must be simple and easy to use. While consumers are willing to devote some time to the learning curve, it can't be laborious or an overly complicated process or consumers say they will not use it<sup>12</sup>.

Emphasizing the beneficial nutrients present in foods is a more positive approach than some of the 'traffic light' systems based primarily on calories and nutrients to limit.

**A unified educational system that harmonizes the food label with the 2005 *Dietary Guidelines for Americans* and *MyPyramid* is the best approach from a consumer perspective, and from a public health perspective.** In 2005, for the first time, the *Dietary Guidelines for Americans* and *MyPyramid* food guide were updated to be complementary tools based on the same scientific criteria. Unfortunately, there is little information at point of purchase that helps consumers put this dietary guidance into practice.

The *Dietary Guidelines* and *MyPyramid* used the concept of nutrient density to promote the consumption of nutrient-dense foods across and within food groups. Tools at point of purchase, such as the food label, have the potential to help consumers make the best food choices possible. But, these nutrition education tools need to link calories and nutrients together rather than address them in isolation. Thus, any unified symbol program on the food label must harmonize with the *Dietary Guidelines* and *MyPyramid*, so that it reflects the entire nutrient package that foods provide, not just calories or nutrients to limit. This approach will give consumers the tools necessary to better implement nutrition guidance, and fulfill the goals as outlined in the FDA OWG charge to *help consumers lead healthier lives through better nutrition* by providing complete information to make wise food choices.

### **Consumers want a unified system**

Consumers say they use cues to make healthful product selections, including product claims and marketed nutrition benefits, such as messages about beneficial nutrients and nutrients to limit<sup>12</sup>. However, in recent research consumers generally reported icons and symbols currently play an insignificant role in helping them make purchasing decisions<sup>12</sup>.

When queried, consumers say they are very interested in the notion of a universal system that could "level the playing field" in the supermarket. They want a standard, objective approach to evaluating a food. Not only do consumers see a universal symbol system as a way to help them eat more healthfully and expedite the grocery shopping experience, they also view it as a way to help them become smarter shoppers. And moms see a symbol program as a valuable tool they can use to teach their children better eating habits. The idea of a logo for foods that could help them identify nutritionally sound foods was very appealing to consumers, since it provides them with a credible and convenient shortcut to choose healthful, nutrient rich foods<sup>12</sup>.

In general, consumers say they would prefer symbols that are:

- Simple, straightforward, based on facts;
- Easy-to-see, easy-to-read, easy-to-understand/comprehend;
- Bright, colorful, and
- Authored by an independent, health-focused organization<sup>12</sup>

### **Summary**

In the end, the primary public health goal of nutrition guidance is to help people build healthier lifestyles. We are at a critical juncture in reshaping the health of Americans. It is not enough to simply tell Americans that they need to eat a high quality diet *or* what *not* to do. The key to success will be showing consumers *how to* make the right choices through positive, motivational messages. A unified symbol program that is science-based, consumer-tested and based on the total nutrition package – not just on calories or nutrients to limit – could be a step in the right direction.

The NRFC strongly believes the development of nutrient profile symbols should not proceed independent of consumer research. Nutritional quality of foods is one reason why consumers select healthy diets. However, their choices are also influenced by a variety of other factors such as food costs, taste, eating pleasure, culture and other factors. Development of any symbol program must take these factors into consideration. FDA should act only when they are satisfied that a scientific process has been followed, and that algorithms are transparent, and have been tested and validated against objective measures of diet quality. In addition, and perhaps most important, FDA should ensure any standardized symbol program has been tested with consumers to verify it actually helps them build healthier diets. Scientists, health professionals and regulators can do the math, but the ultimate goal is to help *consumers* get the most nutritional power from the foods and beverages they enjoy.

The Nutrient Rich Foods Coalition is committed to developing tools that make it easier for consumers to follow Dietary Guidelines recommendations and build and enjoy healthier diets, including nutrient-dense foods and beverages from all five food groups. The Coalition has conducted market research to support communicating nutrient-dense message to consumers. Current plans include ongoing market research with consumers and health professionals to ensure the Nutrient Rich Foods scientific algorithm (score) is translated into an easy-to-use and effective consumer application (tool) that helps Americans build healthier diets. We will be happy to provide FDA with insights as we learn more from our research.

Thank you for your time and consideration.

The Nutrient Rich Foods Coalition

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<sup>1</sup> 2005 *Finding your way to a healthier you: Based on the Dietary Guidelines for Americans* consumer brochure; Dietary Guidelines for Americans.

<sup>2</sup> Dietary Guidelines for Americans 2005. US Department of Health and Human Services; US Department of Agriculture. [www.healthierus.gov/dietaryguidelines](http://www.healthierus.gov/dietaryguidelines) . HHS Publication number: HHS-ODPHP-2005\_01\_DGA\_A; USDA Publication number: Home and Garden Bulletin No. 232.

<sup>3</sup> Munoz KA, Krebs-Smith SM, Ballard-Barbash R, Cleveland LE. Food intakes of US children and adolescents compared with recommendations. *Pediatrics*. 1997; 100(3 pt1):323-9.

<sup>4</sup> Food and Drug Administration Commissioner Charge Memorandum to FDA Obesity Working Group, August 11, 2003.

<sup>5</sup> Naturally Nutrient Rich Coalition. Naturally Nutrient-Rich Message Testing. Shugoll Research, Bethesda, MD. May 2005.

<sup>6</sup> National Cattlemen's Beef Association. Enhanced Information about Calories and Nutrients on Food Labels. Shugoll Research, Bethesda, MD. June 2005.

<sup>7</sup> International Food Information Council Foundation. Food Label & Calorie Research: Qualitative Research Findings. Strategy One Research, Chicago, IL. August 2004.

<sup>8</sup> International Food Information Council Foundation. Food Label & Calorie Research: Qualitative Research Findings. Strategy One Research, Chicago, IL. August 2004.

<sup>9</sup> International Food Information Council. 2007 *Food & Health Survey: Consumer Attitudes toward Food, Nutrition, and Health*. Washington, DC. May, 2007.

<sup>10</sup> Borra S, Kelly L, Tuttle M, Neville K. Developing actionable dietary guidance messages: dietary fat as a case study. *J Am Diet Assoc*. 2001;101:678-684.

<sup>11</sup> Naturally Nutrient Rich Coalition. Naturally Nutrient-Rich Message Testing. Shugoll Research, Bethesda, MD. May 2005.

<sup>12</sup> Naturally Nurient Rich Coalition. Nutrient Rich Foods (NRF) Project: A Qualitative Exploration. Teri Gacek Associates, Chicago, IL. December 2006.