



National Cattlemen's Beef Association

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

Response to Docket No. 2007N-0277
Food Labeling: Use of Symbols to Communicate Nutrition Information, Consideration
of Consumer Studies and Nutritional Criteria

Dear Docket Clerk,

The National Cattlemen's Beef Association (NCBA) welcomes the opportunity to offer comment on the use of symbols to communicate nutrition information to consumers and market research examining how consumers use such systems. Producer-driven and consumer-focused, NCBA is the trade association of America's cattle farmers and ranchers, and the marketing organization for the largest segment of the nation's food and fiber industry. The beef industry has always supported information in the meat case and throughout all grocery aisles that tells a complete nutrition story and helps consumers make educated purchasing decisions.

NCBA commends the agency for its efforts to understand consumer attitudes toward food symbols; consumer interpretation of the co-existence on the food label of symbols and/or other nutrition messages and quantitative information such as the Nutrition Facts Panel; when and how consumers use these symbols; and whether or not nutrition symbols influence the purchase of food items that bear them.

As we further analyze and collect additional consumer research data, we will continue to provide comments in response to this Federal Register notice.

Thank you for your time and consideration.

Handwritten signature of Mary K. Young in black ink.

Mary K. Young, M.S., R.D.
Vice President, Nutrition
National Cattlemen's Beef Association

Handwritten signature of Phyllis Marquitz in black ink.

Phyllis Marquitz, M.S., R.D., J.D.
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Comments in Response to Docket No. 2007N-0277 Food Labeling: Use of Symbols to Communicate Nutrition Information, Consideration of Consumer Studies and Nutritional Criteria

NCBA supports the use of nutrition symbols on food labels and packages to help consumers build healthier diets. **NCBA strongly believes that any symbol program should address the *total* nutritive value of foods and beverages.** Simply focusing on calories alone, categorizing good or bad foods, or emphasizing “nutrients to avoid” provides a disservice to consumers who are looking for information to help them learn “how to eat,” not “how not to eat.”

Attitudes Toward Nutrition Symbols

Consumers need help putting the Dietary Guidelines into action and nutrition labels can be a powerful tool to help them do this by encouraging selection of nutrient-dense foods in the grocery aisle. Keeping this in mind, we designed our research with both consumers and registered dietitians to gain a better understanding of what consumers need to help them build more healthful diets using food labels.

Our research included an online consumer panel among 800 adult food shoppers in a random sample, matched to US Census data distributions (Shugoll Research, 2005). In terms of demographics, about one-quarter of adults (27%) describe themselves as highly health conscious using a scale rating. Most (66%) consider themselves moderately health conscious, and only eight percent (8%) say they are not health conscious. Those who are highly health conscious have a higher household income and are less likely to have children.

We conducted similar research with registered dietitians in two phases – qualitative research with focus groups in three markets and quantitatively, through an online survey with 400 registered dietitians (Technomic, Inc., 2006 and 2007). Dietitians’ areas of practice included general counseling, academia, government or media. All spent at least one-third of their time or more educating or advising on nutrition or weight management that would apply to the general public.

We gauged reaction to food labels and call-outs for calories and nutrients on the front of package across the food aisles based on USDA food groups – including grain, vegetable, meat, and dairy – as well as mixed food products. Nutrients highlighted on front of pack call-outs were either an “excellent” or “good” source of nutrients for that specific food group. **Our findings show that consumers and dietitians strongly believe the Nutrition Facts Panel should list food group-specific micronutrients, and they prefer call-outs for calories and nutrients on the front of the package.** Specifically, seventy-eight percent (78%) of consumers and eighty-eight percent (88%) of registered dietitians agree that the Nutrition Facts Panel should show *all* food group-specific nutrients.

We then asked if a package front that includes calorie call-outs only or a package front that includes calorie and nutrition call-outs was preferred. **Sixty-nine percent (69%) of**

consumers and ninety-two percent (92%) of dietitians preferred the calorie and nutrient call-out combination. Consumers told us that this combination package front would be most useful in helping them choose nutritious foods, and dietitians concurred. Dietitians said this combination was particularly useful when “excellent source of” and “good source of” information was provided, saying it was most useful in providing necessary nutritional value information to them, as well as being the most useful to consumers.

When we coupled the calorie/nutrient call-out information with an expanded Nutrition Facts Panel that lists food group specific micronutrients, fifty-five percent (55%) of consumers preferred this layout. The next most effective combination – a distant second at twelve percent (12%) – was the calorie plus nutrients call-out on front of package that also included the *current* Nutrition Facts Panel on the back.

Our findings indicate that including a food’s complete nutrient package on the Nutrition Facts Panel could help consumers follow the recommendations of the Dietary Guidelines and *MyPyramid* and “get more nutrition from their calories.” **Packages with front-of-pack call-outs for both calories and food group-specific nutrients are most effective in helping consumers choose nutritious foods.**

The Problem with a “Calories Only” Approach

According to our research findings, consumers generally do not know how many calories they should be consuming and do not know the difference between a high-calorie and a low-calorie food. Thus, most consumers do not understand how to interpret calorie information from nutrition labels since they don’t know how many calories they should be consuming and the role calories play as part of a healthy lifestyle.

In an attempt to understand the role of calories and nutrients in consumer food purchases, we asked consumers to rank four food items as represented by their current Nutrition Facts Panel in terms of being healthy and nutritious and to indicate which they would be most likely to purchase, assuming all met similar quality, taste and cost expectations.

Consumers generally understand that low-calorie foods are more healthy and nutritious than high-calorie foods. Similarly, they understand that high-nutrient foods are more healthy and nutritious than low-nutrient foods. But when asked to rank the order in which the food labels presented to them represented the most healthy and nutritious food, consumers named the two low-calorie foods equally often, despite the fact that one of the products (lowfat milk) is richer in nutrients than the other product (diet soda).

Focusing on calories alone may lead to the unintended consequence of consumers choosing low-calorie, less nutrient-dense foods. However, labels that provide consumers with a more complete nutrition story can help them make nutrient-rich food choices and follow the recommendations of the Dietary Guidelines and *MyPyramid*. Consumers generally want food labels that are easy to use and easily fit into their lives. They look to the Nutrition Facts Panel to tell them which nutrients are being provided by the different food categories. **Improving labels to make consumers more aware of the**

nutrient content of products by use of call-outs on the front panel is valuable since it would encourage consumers to compare products and choose the healthiest options.

Prominence of calories alone is not motivating enough for behavior change, nor is changing the food label alone. **Including information on the entire nutrient package of foods gives consumers the tools necessary to better implement nutrition guidance and fulfill goals outlined in the FDA's Obesity Working Group Report charge to "help consumers lead healthier lives through better nutrition and help consumers to make wise choices."**

By providing information about nutrients specific to each food group, the label brings to life the recommendations of the Dietary Guidelines and *MyPyramid* into a useful tool at point of purchase, thus ensuring a unified education system. Food labels need to work harder to help fulfill health recommendations to choose nutrient-dense foods within and among all food groups to help consumers get more nutrition from their calories. Call-outs that provide calorie *and* nutrient information on package fronts are a clear way to accomplish this goal.

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