NATIONAL RESTAURANT ASSOCIATION®

REPRESENTING THE RESTAURANT INDUSTRY

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September 18, 2007

Division of Dockets Management (HFA-305)
Food and Drug Administration
5360 Fishers Lane, Room 1061
Rockville, Maryland 20852

Docket No. 2007N-0277: 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:

Founded in 1919, the National Restaurant Association is the leading business association for the restaurant industry. Together with the National Restaurant Association Educational Foundation, the Association's mission is to represent, educate and promote a rapidly growing industry that is comprised of 935,000 restaurant and foodservice outlets employing 12.8 million people. As such, nutrition is a priority for our ever-growing industry. We would like to take this opportunity to comment on the Food and Drug Administration's request for comments on the use of symbols to communicate nutrition information and consideration of consumer studies and nutritional criteria.

The National Restaurant Association believes that it is important for the public to receive positive messages about nutrition from responsible officials. The public is often confronted with the mixed messages that they receive on nutrition. This is why we urge the Food and Drug Administration to provide dietary and lifestyle advice that is consistent, easily understood and applicable to the American public today.

While it is true that more Americans than in years past seem to express awareness of the important role that balance, moderation and physical activity play in a healthy lifestyle, we as a nation still have a long way to go. Many consumers are demanding more nutritious options, but there is still a great deal of the public who do not have the foundation of knowledge and education to use the nutrition information provided to them.

We believe that it is important that as the FDA examines its role and responsibilities in addressing the major public health problem of obesity, you keep in mind that our diverse population is much in need of recommendations that are understandable and relevant to how they live their lives. The clear need is for a consistent message that promotes healthier thinking and lifestyles.

2007N-0277 C1

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Issue 1: There are many food label nutrition symbol programs currently in the domestic and international marketplace. Each system uses different nutrition criteria and requirements regarding eligibility for use. The agency would like information on the food products that bear nutrition symbols and the nutrient requirements for those symbols.

In surveying our members, the National Restaurant Association found that use of symbols varied greatly among operations. Many restaurant companies told us that they do not currently use nutrition symbols on their menus, while others shared information about such items. Below are some of the responses that we received when we posed the FDA's questions on this issue.

> *We do not use symbols in our restaurants, but we use symbols on some of our retail products. We developed a program to identify items that meet the following criteria: not more than 35% of the calories from fat, not more than 35% of the DV for sodium and 0 grams of trans fat per serving.*
>
> *We use a logo for our fit fare items. The only criteria we have for that is that it means there are 15 grams or below of fat per serving. We do have a box at the top of the breakfast menu page that states that fit fare equals 15 grams of fat or less.*
>
> *We have a check mark on our new brochure next to menu items that have less than 10 grams of fat.*
>
> *We do not use any mainstream nutrition symbols on our menu, except symbols that we have created exclusively for our restaurant. For example, we have a fork with a halo that symbolized our healthier entrees.. The symbols we use represent specific calorie, fats and fiber levels within the menu items in that category. Our Company Nutrition Council established healthier menu item criteria based on various sources, including the Institute of Medicine's nutrient recommendations. Our healthier plate criteria is as follows: 600 calories, less than 30% total fat, less than 10% saturated fat and at least 6 grams of fiber. We have no educational programs for consumers related to the symbols as their meaning is noted on the menu.*
>
> *The most commonly used nutrient based icon is based on multiple nutrients (calories, saturated and trans fat, total fat, cholesterol, and sodium). However in healthcare and senior dining we do also use a "low sodium" icon. The nutrient criteria vary by food category...i.e. entrée, whole meal, side dish and snacks (includes vending snacks also). For snacks we have added an "added sugar" threshold also. There is a brief description with the symbol and more detailed information in pocket icon guides, on websites, posters, plasma stations signs, etc.*

As you can see, the responses, use of nutrition symbols and nutrition standards varies greatly among our restaurant members. We do not currently have conclusive research on how customers use these icons, nor do we have information on the sales of such items. A lot of this information is proprietary, and not available for public use. We have heard anecdotally about both the successes and failures of using nutrition symbols on menu items.

early in the design phase. The basic concept of "building blocks" for protein, "fuel gauge" for carbohydrates and "measuring tape" for fat remained relatively intact throughout the design process. Other icons, like calories and salt, proved to be more of a challenge.

McDonald's experimented with reapplying traditional packaged goods nutrition information formats to packaging in some parts of the world. However, the traditional format was designed for the packaged goods industry for products that would be used at a later time, so it wasn't ideal for McDonald's single-serving immediate use products. And merely reapplying the packaged goods format did nothing to address the "difficult to use and understand" issues with this format documented in numerous independent research studies.

Encouraged by internal research and by stakeholder feedback on the European prototypes, the McDonald's global management team realized that the European system had the potential to "go global." After reviewing the evidence, McDonald's made the decision to develop a *universal* language for sharing nutrition information that could be used in its 30,000+ global restaurants. The criteria for each area of the world is dependent on regionally recognized nutrition standards.

This decision to go global created some challenges. Because the initial visuals had been designed for a European audience rather than a global one, cultural analysis was needed to ensure that the visuals would be acceptable in all countries. And because many markets, including Europe, share packaging due to their geographic proximity, the visuals needed to be easily recognizable so as to be usable with or *without* language. This is because some packages could be used in countries collectively speaking over 10 languages; written descriptions next to a visual for that many languages would not be feasible, due to space limitations.

McDonald's needed to understand the findings from the iconic analysis at a glance. Which icons were acceptable? Which needed just a few minor tweaks? And which needed complete revamping? To make this possible, ENLASO's McDonald's account team reviewed every individual comment from all 109 countries. The various topics multiplied by the number of visuals and countries added up: they had 15 icons, and 8 evaluation comments. That gave them 120 comments by 109 countries and amounted to 13,080 comments to distill and assess. Below are some of the key findings that were reached after reviewing these comments.

The role of color

The unanticipated interpretations that color added to the picture had to be considered. They found that red signals danger or caution in many cultures. They also found that universally the combination of black images on a yellow background is associated with traffic signs.

Design

The design and evaluation phase for most of the five primary nutrient visuals went fairly smoothly. Some of the supplemental nutrients proved to be more troublesome.

Although the designers used what they perceived as logistical associations for the initial image designs, there were many surprises. A good example was the effort in defining an image for calcium. A "bone" seemed a logical association to most Westerners, but it had

Issue 2: The presence of nutrition symbols could affect the food purchasing decisions of consumers. Symbols could help consumers make food choices, but it is also possible that symbols could introduce confusion when making decisions. The agency would like information on consumer research that supported the development of these programs and research that illustrates how these programs are understood and utilized by consumers.

The use of symbols to communicate nutrition information for restaurant foods has not been researched by many, although some information does exist to describe the efforts of one company to create universal nutrition icons. While this Case Study does not show how consumers have used the information, or how it has affected purchasing decisions, it shows the vast amount of consideration that needs to go into creating such icons. A number of considerations were made and many important lessons were learned in this process.

The following information is excerpted from the Case Study "Creating a New Language for Nutrition: McDonald's Universal Icons for 109 Countries" by Maxwell Hoffman. (See Attached for full Case Study) This Case Study describes one restaurant company's research and development of visual icons representing key food nutrients for universal use. The Case Study can be found at:
http://www.translate.com/technology/multilingual_standard/McDonalds_Nutrition_Icons_Case_Study.pdf

Overview

In January 2007, McDonald's and ENLASO Corporation, a provider of translation and localization solutions, released a case study on how icons, designed to represent nutritional information, were culturally evaluated for worldwide use. McDonald's decided to take its Nutritional Initiative to all of its markets by visually representing nutritional information on food packaging globally. The main challenge was developing icons or images that would work with or without language, in over 109 locales. Team members analyzed over 13,000 comments and tested dozens of variations of the nutrient visuals. This case study covers how ENLASO's linguistic iconographers determined which images would work in all regions without offending local cultural sensitivities.

McDonald's and ENLASO focused on five main nutrient visuals (calories, fat, carbohydrates, protein, salt) that would be used globally on packaging, and also designed and evaluated half a dozen supplemental nutrient visuals that might be needed in some locales.

Early on, the McDonald's team discovered there were no established standards for "language free" nutrient visuals that could be copied or modified. Designers at UK-based Boxer Design Consultants tried a variety of early prototypes before hitting the mark. The goal was to make them visuals so obvious that a five-year-old could understand them. Early test designs were discarded, including abstract symbols resembling molecular structure. Three of the five main nutrients (protein, carbohydrates and fat) "gelled" fairly

negative and sometimes insulting connotations in other cultures. A smile for teeth was also a mystery to some countries. Milk containers (cartons and bottles) were not recognized in many Asian cultures, and sometimes were associated with something as negative as poison.

Consideration of whether the visual print in all media, including packaging
McDonald's had to ensure that the artwork was suitable for printing on diverse forms of packaging. The image had to be capable of being reduced to a very small size and printed in monochromatic inks for certain packaging. Some design refinements were required to accommodate printing restrictions. For instance, early images for protein, fat and carbohydrates included letters, numbers and vertical lines which became fuzzy when the images were reduced to final print size. Letters were removed from the blocks in the protein image, and numbers were dropped from the ruler and gauge images (fat and carbohydrates, respectively) to improve legibility. Some colors were changed because nutritionist feedback identified red with protein, yellow with fat and green with energy.

Printed visuals also must work on a wide variety of packaging surfaces, ranging from "SBS" (coated carton material, like French Fry containers), F-flute (an uncoated carton material), foam, and paper.

Additional Discoveries
McDonald's and ENLASO discovered that an established abbreviation for calories, "kcal" or "Cal" could be used in most western countries. However, a non-language calorie image was required for many markets. A "sun burst" or "radiant dial" visual was eventually approved as the most appropriate choice. Global cultural feedback indicated that most countries would associate this image with the sun or energy, a parallel to calories and "food energy".

Although ENLASO and McDonald's have made every effort to qualify and select icons that could work in all locales, obviously some compromises had to be made.

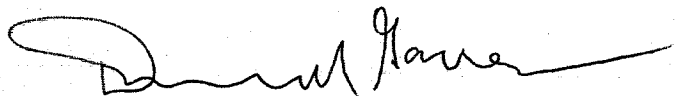
Conclusions
The system created by McDonald's and ENLASO is intended to be an easy-to-understand, visual nutrition language. McDonald's intends to promote understanding of the images through supporting materials globally, from web sites to images explained on tray liners and via in-store displays. After repeated exposure to these images, customers should eventually grasp their meaning, with or without printed labels next to them.

The information above shows one company's experience in exploring the use of symbols to communicate nutrition information on food packaging. It does not explore, however, how the symbols are utilized by customers. Research on how such symbols affect consumers' choices and overall nutrition needs to be conducted. As the FDA looks at this issue, we encourage you to consider a standard approach that would not further confuse consumers on the issue of nutrition.

Once again, we'd like to thank you for helping us to continue this dialogue with you and your colleagues. We believe that our communication on this important topic has set the stage for some valuable work ahead. Our shared commitment to nutrition and healthy lifestyles gives us many opportunities to work together in the near future, and we look

forward to that. The National Restaurant Association appreciates the opportunity to submit these comments and thanks the FDA for soliciting the opinion of the restaurant industry. Please feel free to call on us with any questions you may have regarding this issue, at (202) 331-5986.

Sincerely,



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