



PRIVATE LABEL MANUFACTURERS ASSOCIATION

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

Subject: Comments on Food Labeling and the Use of Symbols to Communicate Nutrition Information

Docket No. 2007N-0277

This letter is a formal response to the Food and Drug Administration's request for comments on food labeling and the use of symbols to communicate nutrition information and its consideration of consumer studies and nutritional criteria. Since private label represents 21% of all products sold in supermarkets to consumers, the private label industry is especially concerned about the subject of new regulations affecting labeling of food products. As the association representing the industry, PLMA is pleased to offer the following comments.

Background of PLMA

PLMA (Private Label Manufacturers Association) is an organization of more than 3,000 member companies in the United States and around the world involved in the manufacture of products sold to consumers under the retailer's brand names. Products supplied by PLMA member companies include food and beverages, toiletries, cosmetics and health care products, household and kitchen products, house wares, DIY and leisure products. PLMA member companies range from large, multi-national companies to small, quality manufacturers who manufacture store brands, to major retail and wholesale chains which own their own manufacturing facilities, and regional brand manufacturers. PLMA regularly sponsors market and consumer research and works closely with retailers and wholesalers in identifying issues that impact private label.

Role of Retailers in Food Labeling

Retailers have been in the forefront on the issue of food labeling. They have introduced entire ranges of healthy and nutritious private label products as well as prominently featuring nutritional benefits voluntarily on their products and establishing special sections and shelf tags to make it easier for consumers to find healthy products. Private label products have highlighted such features as high fiber, low salt, low fat and other health benefits. Companies such as Hannaford, Publix, Giant, and Stop & Shop, among others, have taken innovative steps to make it easier for consumers to find healthy choices through their stores.

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To highlight healthy products to consumers, Hannaford created its 'Guiding Stars' program. In 2003 Hannaford surveyed its customers to find out what they liked, disliked and desired from Hannaford when it came to nutrition and finding nutritious products in the store. The result of this survey is its 'Guiding Stars' program. It is a system where labels are placed on the shelves with a ranking from 0 stars for little nutrition to 3 stars for very nutritious and healthy products. It is an efficient program which helps consumers find healthy products quickly and easily. It is also a way for the retailer to help shoppers find nutritious products without burdening manufacturers with costs for new packaging or confusing consumers with new symbols.

Publix has also implemented a store-wide shelf tag nutrition program where nutrition facts help consumers make healthy food choices. Foods are highlighted that are especially healthy and beneficial to their customers. The shelf tag clearly displays important nutrition information, and indicates what makes a particular food a good choice. Among the information highlighted are levels of calories, cholesterol, fat, sodium, or sugar, with consistent standards across brands and categories. Publix' nutritional tags are based on FDA labeling criteria and the Dietary Guidelines for Americans. Like the Hannaford program, Publix program makes it easier for shoppers to find healthy products and alerts them to health benefits in those foods.

Another approach has been that of Tesco in Great Britain. This retailer has pursued a program of emphasizing their private label products to help consumers find nutritious products. In 1984 Tesco released its healthy living range of private label products. In the 23 years since then, Tesco has released an organic range, a line of private label healthy products for children, highlighted special nutritional features on its products, and set up special sections for healthy products within its stores. Tesco also conducted consumer studies and examined its sales to find out what consumers wanted from their supermarkets. The company made sure it had high quality healthy private label products easily available for consumers who sought them and made them available to them across their stores.

Going beyond nutritional symbols, retailers have also pioneered in promoting numerous healthy products. Organics have gone from a curiosity to availability in almost every supermarket in the country, often under private label brands. Retailers have also led in promoting the health benefits of fiber, low salt content, low fat, and zero trans fat before government regulations or recommendations on these statements were released.

Recommendations

With this background, PLMA believes that the marketplace should be given the opportunity to address the subject of nutritional symbols. New government regulations at this time can only have a negative effect. It is well-known that changes in labeling result

in additional costs in the food supply process. This has special impact on the private label industry where each manufacturer must modify hundreds of labels in order to service its retail customers. As demonstrated in previous testimony to the FDA, this is costly and time-consuming, and entirely different from what is faced by national brand manufacturers, who usually only modify a limited number of their brands.

PLMA believes that existing FDA nutrition labeling regulations and the Dietary Guidelines published by the USDA and HHS are already helping retailers and consumers receive information about products. PLMA recommends that the FDA allow the creativity and innovation of the private sector to fully percolate and achieve the objective of promoting healthier eating.