

Coca-Cola Comments
FDA Public Hearing on Use of Symbols to Communicate Nutrition Information
Docket No. 2007N-0277
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Good afternoon. My name is Helen Falco and I serve as the Director of Nutrition and Health Policy for The Coca-Cola Company. I appreciate this opportunity to present Coca-Cola's views on the use of symbols to communicate nutrition information. Before making my remarks, I would like to state that Coca-Cola acknowledges the importance of identifying and implementing solutions that will enhance the health, well being and nutritional status of the public. At Coca-Cola we believe in offering people choices and we provide a wide variety of beverages—as well as portion sizes—to meet consumers' needs for fun, refreshment, nutrition and hydration. From our range of products, package sizes and the information provided on these packages, including the dual labeling provided for serving size and total package, consumers can make sensible beverage choices that are compatible with a healthy, active lifestyle.

However, just having nutrition information available is not enough. The challenge for all of us is to identify what "really" will work to promote healthy lifestyles, and what will result in positive, sustainable changes, in the health of consumers, in particular with respect to obesity.

We would like to thank FDA for convening this public hearing to discuss the increasing interest in nutrition symbols. Coca-Cola wishes to provide brief comments that will cover three main points related to research and education:

1. Comprehensive US population-based research is needed before embarking on any governmental approach to nutrition symbols.
2. Concerted, sustained and creative education programs must underpin current and future nutrition labeling initiatives.
3. Successful educational initiatives must inform, motivate and empower consumers to achieve better diets and better health.

Coca-Cola has participated in industry and government discussions on the use of nutrition symbols in many parts of the world, including in the United States. And, we have applied objective, fact-based symbols in some countries, in particular where nutrition labeling has not been mandatory.

While we continue to learn from experiences in other countries, we believe that consideration about use of nutrition symbols needs to be addressed in the national context, taking into account existing regulatory conditions, as well as consumer health issues and interest. In particular, consideration should be given to the availability of alternate solutions that could be effectively and efficiently utilized to help slow the rate of obesity and eventually reduce its prevalence in our society.

FDA has asked challenging questions with respect to existing research on nutrition symbols. While a number of qualitative and quantitative investigations have been carried out and reported on during this hearing, comprehensive answers to how these programs are understood and utilized within the context of the total diet remain

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unclear. There simply is no definitive indication that creating yet another on-pack representation of nutrition information would be motivating, would make a difference, especially with respect to the prevalence of obesity. Furthermore, there is no definitive indication that broader use of nutrition symbols would help stem the confusion about diet and health.

In our opinion, there is need for comprehensive US population-based research that would demonstrate whether or not nutrition symbols would serve as an effective tool in helping American consumers achieve a healthier overall diet and in doing so, help reduce the incidence of obesity. And, if the answer is affirmative, additional research would be needed to identify which types of nutrition symbols and supporting educational initiatives would best achieve this purpose.

And what is even more critical...we need research to help determine the basic underpinning of what motivates the consumer to read, understand and act on nutrition information. We need to determine why currently available information does not yet seem to resonate with so many people. Our ascertaining this basic, though not simple, question is essential.

Until such research is available, we believe that it would be premature to embark on any governmental approach to use of nutrition symbols for the US population. Nevertheless, we can't wait for all the answers before taking action. At the very least, we must use the tools at hand and begin to develop the necessary educational foundation that will lead to changes in diet – and changes in health.

What, then, are the alternatives, within the US context?

The US is in a unique position, having implemented mandatory nutrition labeling some 15 years ago. Consumers see the Nutrition Facts panel nearly every time they pick up a packaged food or beverage product. They see it, but do they understand the information? Can they use it to select an overall healthy diet? Despite the familiarity that consumers have with this “grandfather” of nutrition symbols, there is good evidence that the answer to these questions is all too often “no.”

Certainly, improvements to the format and content of the Nutrition Facts panel can and should be considered. But will this be enough? We think not. Just like any other complex instrument – MP3 players, the new hybrid cars – consumers must be taught to use the Nutrition Facts panel before it can impact their lives. It cannot achieve the desired outcome – better diet and health – on its own.

It is Coca-Cola's position that only through concerted, sustained and creative education programs that are supported by all stakeholders -- government, consumer groups, health professionals, the food and beverage industry, schools, parents, the media – in other words, by all of us, can we slowly, but surely, help reduce the prevalence of obesity in the US population.

There are many who say, “Education, we've tried that, it doesn't work.” We can agree that scattered, short-term initiatives that lack the necessary scientific evaluations to substantiate the work are unlikely to have the needed impact. Further, education can't be just one way. We have to approach it from many angles and from many disciplines.

To that end, what if we were to harness the collective genius of all stakeholders to develop and execute programs that **inform, motivate** and **empower** consumers to take charge of their own diets, their own level of physical activity, their own health? Change would not be instantaneous, but we believe that it would be observed over time, that small steps would eventually lead to big successes.

One way Coca-Cola plans to increase understanding of the Nutrition Facts panel and the ingredient panel (let's not forget, the ingredient panel also carries with it a lot of good information) is through a program we will be initiating called "Be Label Conscious". It is designed to increase the "consciousness" of consumers as it relates to the food label—to increase their awareness, knowledge and understanding of this important tool. We will update you on its progress as it moves forward.

As you reflect on the vast amount of information that has been presented over these two days, we encourage you to consider the importance and power of education – whether it is education to improve the understanding and use of the Nutrition Facts panel, or, potentially, education to understand and use nutrition symbols. Without concerted education programs that motivate and empower the consumer, we will continue to engage in graphic exercises, and, unfortunately, we will leave the problem to be solved by the next generation.

Thank you for your consideration. Coca-Cola will be providing additional, detailed comments on this important topic. We look forward to continued collaboration with you and with all other stakeholders to identify and implement effective solutions that will lead to a healthier America – solutions that will finally turn the tide on obesity.