

FDA Hearing on Front Label Nutrition Symbols
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Testimony

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Good morning and thank you very much for inviting the Center for Science in the Public Interest to participate in this hearing. I'm excited that the FDA is exploring the use of front-label nutrition icons. Such labeling might be the single biggest advance in food labeling and a highly effective way to promote healthier diets and lower rates of diet-related diseases.

CSPI and I have long been interested in rating the relative nutritional quality of foods and using front-label icons to provide consumers with easily understood information. In fact, one of my very first activities at CSPI in the early 1970s was to develop, with the help of a slide rule and an intern, a complicated algorithm to express the overall nutritional value of foods in the form of a simple number. For instance, a serving of broiled cod had a score of +50, while a hot dog had a score of -20. Our Nutrition Scoreboard approach simplified the multi-variable science of nutrition and formed the basis of very popular books and posters. In the late 1980s, my book "The Fast-Food Guide" used another algorithm that rated the healthfulness of fast foods and meals. Also in the late 1980s, CSPI began advocating nutrition labeling. We proposed, but FDA rejected, that every package bear a "nutrition square" divided into four quadrants, each representing a key nutrient, such as calories, fat, salt, and fiber. The quadrants were to be colored green, yellow, or red depending on the levels of those nutrients. Finally, last November 30th, after seeing U.S. companies and other nations use simple food rating symbols and front-label icons, we petitioned the FDA to open a rulemaking to explore a national system of front-label symbols.¹

Let me emphasize that front-label icons should not replace Nutrition Facts labels. Those labels provide the detailed information that would be encapsulated in simplified front-label icons. The details are invaluable to tens of millions of consumers who are choosing products on the basis of their content of sodium, added sugar, saturated fat, and other nutrients. However, Nutrition Facts labels are complicated. Even a trained nutritionist can get dizzy comparing foods in a category that have very different amounts of, say, sodium, saturated fat, vitamin C, and dietary fiber. That's why simple front-label icons could be a real breakthrough in reaching people who are less motivated than a heart disease victim or diabetic to study as many as several dozen numbers on a nutrition label. Ideally, many people who use the new icons also would begin using Nutrition Facts labels. Front-label icons should be designed to be readily understandable by children, people with poor eyesight, people with little education, and people who speak little English. How nice it would be to be able to tell a child that he or she could choose anything in the store that had a green dot.

¹ Docket 2006P-0498/CP1.

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