

Summary of Themes Heard from Stakeholders during Breakout Sessions at the Public Meeting on *Use of the Term “Healthy” in the Labeling of Human Food Products*

Background

On March 9, 2017, the U.S. Food and Drug Administration (FDA) held a public meeting entitled, *Use of the Term “Healthy” in the Labeling of Human Food Products*, at the Hilton Washington DC/Rockville Hotel, 1750 Rockville Pike, Rockville, MD 20852.

The meeting gave participants an opportunity to discuss the term “healthy,” and provide input on how “healthy” should be defined when used in the labeling of human food products. The meeting included introductory presentations from FDA representatives; stakeholder perspective panels featuring industry representatives, food analysts, and nutritionists; and multiple opportunities for individuals to express their opinions through oral presentations, public comment, and breakout sessions. Stakeholder participation included 224 in-person participants and 446 webcast viewers for a total of 670 attendees.

This meeting was part of our effort to redefine the “healthy” nutrient content claim for food labeling, an effort driven by advancing nutritional science and evolving dietary recommendations to support public health. We [requested public comment](#) on this matter on September 28, 2016, in a notification that established a docket (81 FR 66562) as well as in the [notice announcing the public meeting](#) (82 FR 10868; February 16, 2017). The comment period is open through April 26, 2017, and the docket number is [FDA-2016-D-2335](#).

During the meeting, we held two rounds of three breakout sessions (summarized below), giving participants an opportunity to choose which two breakout sessions to attend.

- **Healthy as a Nutrient-Based Claim** focused on a definition of “healthy” based on quantitative levels of nutrients (the current definition approach). Within this definition, the focus is on those foods that provide nutrients for which there are concerns regarding intake and/or are associated with chronic disease risk.
- **Healthy as a Food Component-Based Claim** focused on a definition of “healthy” based on food groups and components. In both this breakout session and the Nutrient-Based Claim breakout session, we asked participants whether a hybrid of the two approaches or some other bases for defining “healthy” should be considered.
- **Consumer Meaning and Understanding of the Term “Healthy”** focused on the consumer’s perspective: how consumers actually think of and use the word “healthy” and how changing the definition of “healthy” for use on the food label could affect consumer behavior and public health.

Key Themes Raised During Breakout Sessions

The key themes, perspectives, and ideas that participants raised during the breakout sessions are summarized below; these summaries do not necessarily represent our viewpoints. These themes generally cut across all breakout sessions, though some applied more to one breakout topic than to the others. The ideas are grouped into five overarching themes with more specific comments or ideas captured under each.

“Healthy” is a broad term subject to wide interpretation: Participants stressed that devising a universal, one-size-fits-all definition of “healthy” could prove challenging because health, and one’s perception of what that means, is subjective. What one person considers healthy, another person may not, and the science behind nutrition, especially the most current science, may or may not be considered in developing these understandings. Key points included:

- Foods are healthy only within the context of a healthy dietary pattern. Overconsumption of any food regardless of the food components or nutrients can be unhealthy; however, it is also important to note that the level of an individual nutrient that is healthy for one individual is also affected by other factors.
- The research behind nutrition and what is healthy evolves as science evolves.
- One’s understanding of which foods are healthy may depend on his or her health goals. For example, someone trying to lose weight may think of healthy differently than someone wanting to build muscle.
- Consumers’ perceptions of what “healthy” means can be influenced by their background, values, culture, family, education, generation, and other personal factors.
- Consumers do not necessarily think of foods as healthy or in absolute terms. They may think of a food as healthy relative to other options in that food group. For example, opting for zero calorie soda may be a better choice *compared to* regular soda.
- Consumers can sometimes merge “healthy” with other product claims such as “organic,” “non-GMO,” “gluten free,” and “hormone free.” Some people perceive foods with these attributes as healthy, though this assertion is not based on nutritional make-up of the food.
- Because of the wide variability and interpretability of “healthy,” and the risk of misleading consumers, some suggested that the term “healthy” should not be allowed in food labeling. However, participants also predicted that if “healthy” were not allowed and defined, producers would likely gravitate more toward terms with a similar meaning such as “fit” and “smart” and potentially increase consumer confusion.

Consider a combined approach: Many participants favored a definition of “healthy” that combines both nutrient-based and food component-based criteria. Rationale for considering this approach and specific ideas included:

- Incorporating more food component criteria into the definition may align better with the *Dietary Guidelines for Americans*, and allow for the term “healthy” to apply to foods such as avocados and nuts, which do not qualify as “healthy” under the current definition.
- In general, healthy diets will include more fruits and vegetables and less processed and prepared food, and a food component-based definition of “healthy” may be more consistent with this ideal.
- There should continue to be nutrient-based disqualifying criteria. For example, foods with added sodium or sugar can be part of a healthy diet, although the individual item may not be considered healthy.
- It is important that nutrients, and the percentage of the Daily Value of those nutrients, continue to be considered in the overall definition of “healthy.” Likewise, it is important to include some consideration of food components because not all nutrients have the same dietary value. For example, the nutrient content of some vegetables can vary widely.
- Fortification should not be allowed when its sole purpose is to qualify the food for the “healthy” designation. However, the definition should make allowances when fortification is needed to address nutrients of concern such as those noted in the 2015-2020 *Dietary Guidelines for Americans* (e.g., vitamin D).

- Consider different criteria for defining “healthy” for different food groups, or for fresh foods and processed foods. A single set of criteria may be too restrictive and not apply across all foods. However, participants also cautioned that too many criteria or sets of criteria may confuse consumers and weaken the value of the term “healthy.”

Make food labels easier to understand: Participants noted that nutrition information can be overwhelming and complex, which can challenge consumers’ understanding of food labels, making it difficult to determine the healthfulness of the products they buy. Participants provided several suggestions for improving the clarity of nutritional information on food labels, and how the term “healthy” might be included on those labels:

- Recognize the percentage of Daily Value can be a challenging concept, perhaps because consumers do not have a good sense of the amount of each nutrient they should or do consume as part of their diet over the course of a day. It may be easier to understand if the nutritional value of a product aligned more closely with USDA’s [MyPlate](#) or was conveyed in terms of a single food group. For example, “provides 2 of the recommended 5-9 daily servings of fruits and vegetables.”
- Consider using the MyPlate label or other graphical tools to convey nutritional facts to improve consumer understanding and access to information.
- Align health and nutrition messages and frameworks across agencies. USDA and FDA nutrition information currently differs in the way it’s communicated generally, and in how it is presented on packaging specifically, which can be challenging for consumers.
- Minimize the “clutter” or number of health and other claims on food labels. Consumers are often overwhelmed with the number and types of information on food labels and health claims, and nutritional information can be lost. The “healthy” claim may be more impactful if effort were made to reduce the amount of claims on packaging. Participants also acknowledged that it can be difficult to distinguish between health claims on food labels and basic advertising, branding, and package designs.

Healthfulness is only one of many factors that drive purchasing decisions: In discussing how changing the definition of “healthy” might affect purchasing habits, participants noted that healthfulness is often not the most influential factor, and therefore may not dramatically affect consumer choices. Points along these lines included:

- Factors such as price and taste still inform consumer choices more so than healthfulness.
- Absence claims, such as “gluten free” and “non-GMO,” and production practice claims like “organic” are major factors of consumer decisions. Data show that these claims are currently more attractive to consumers than health claims.
- Consumers may associate “healthy” with other attributes that may actually dissuade them from purchasing the product. For instance, they may associate healthy foods with being less tasty or with being more expensive.

Education is key: Participants emphasized that the term “healthy,” however it is defined, will not be useful to consumers in making dietary decisions unless they understand what it means and that it applies in the context of overall dietary patterns and a healthy lifestyle.

- Changing the definition of “healthy” is not likely to affect consumer purchasing habits unless accompanied by public education and increased nutritional awareness.
- Some education might be done through food labels themselves. Given the broad interpretability of “healthy,” some participants suggested that the claim on food labeling would be more

meaningful to consumers if it were accompanied by a brief explanation of why or in what way the product is healthy.