

Food and Drug Administration public hearing, 10-11 September, Use of symbols to communicate nutrition information

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Thank you for inviting me here to day. In my presentation I simply want to present what I think is a logical framework for thinking about nutrition labelling - including front of pack nutrition signposting (symbols) - that assumes that such labelling is, and should be, designed to communicate comprehensible information about the nutrition content of foods. This logical framework sees nutrition labelling as a way of helping consumers make sense of dietary guidelines (population dietary goals). To use nutrition labelling to make sense of population dietary goals nutrition labelling has firstly to direct consumers' attention to what is important about the nutrient content of the food and secondly to convey to the consumer that information in a way that makes sense to them. (My presentation addresses Issue 1 (Questions 3-4) of Issues and Questions for Discussion in the Federal Register notice.)

So in this presentation I will argue that population dietary goals [ohp] lead to Guideline Daily Amounts (Daily Values in the US) which in turn leads to presenting nutrition levels in foods as percentages of Guideline Daily Amounts. Having done this it makes sense to categorise the levels of nutrients in foods as high, medium and low, or even better, red, orange and green, and having done this to integrate the information about individual levels into an overall score which means individual foods can be categorised as healthy, intermediate and unhealthy.

For the remainder of this talk I will amplify this logical framework or progression.

So here is the basic back-of-back format for nutrition labelling - prescribed by EU law - for use in Europe [ohp]. This is the labelling for a pizza. Almost everyone agrees that this form of nutrition labelling is almost impossible for consumers to understand. Here is a quote from some research we carried out in the late 1990s when this form of nutrition labelling was virtually the only form. For this research we taught consumers some basics of thinking aloud and then persuaded them to think aloud into a tape-recorder while they went on their regular shop round a supermarket. Obviously they didn't use the nutrition labelling very much but here is an instant where one of them did [ohp].

Why cannot this consumer understand the nutrition labelling? This is for main two reasons: Firstly there is just too much information and no indication of which bit of the label is most important. Secondly the information it contains seems to bear no relation to their personal health. Now most nutritionists have sought to characterise what would be a healthy diet for the population by producing tables of dietary goals such as this one [ohp]. As you can see it is of little use in helping the consumer interpret the nutrition labelling table - should they even attempt to do so - because the ideal levels for nutrient intake in the table of population goals are expressed in way

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