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October 11, 2018

Dockets Management Staff (HFA-305)
Food and Drug Administration
5630 Fishers Lane; Room 1061
Rockville, MD 20852

Re: Docket No. FDA–2018–N–2381; “The Food and Drug Administration’s Comprehensive, Multi-Year Nutrition Innovation Strategy; Request for Comments

Filed electronically at <https://www.regulations.gov/>

Dear Dr. Gottlieb:

The Institute of Food Technologists (IFT) is a global organization of close to 17,000 individual members from more than 100 countries committed to advancing the science of food. Since 1939, IFT has brought together the brightest minds in food science, technology and related professions from academia, government, and industry to solve the world’s greatest food challenges. Our organization works to ensure that our members have the resources they need to learn, grow, and advance the science of food as the population and the world evolve. We believe that science is essential to ensuring a global food supply that is sustainable, safe, nutritious, and accessible to all.

IFT appreciates the opportunity to comment on the Food and Drug Administration’s (FDA) Comprehensive, Multi-Year Nutrition Innovation Strategy. We commend Commissioner Gottlieb’s recognition of the importance of improving nutrition and diets of Americans as another transformative effort to reduce the burden of many chronic diseases. Toward that goal, we appreciate that the Agency is undertaking this important initiative, to identify better ways of communicating science-based nutrition information to empower the public to make informed food choices and to improve their diets. This would also allow scientists and engineers in the food sector to design ingredients and food and beverage products that meet individual and family needs (such as health and nutrition, sustenance, pleasure, and affordability), with diverse age groups and lifestyles, in a holistic way.

The 2018 International Food Information Council (IFIC) survey of adults over 50 years of age reported that although Americans are interested in making healthy food choices there is a lack of understanding about what foods can help achieve desired health outcomes. For example, 32% of the adult respondents couldn’t name a specific food or nutrient that they avoid to help them achieve their prioritized health outcome, and 26% could not name a food or nutrient they would seek out to help with their most important health outcome. Forty-one percent of the respondents indicated that knowledge about food was among the top three factors that make it easier to achieve a healthy diet

(IFIC 2018a). These data suggest the need for educating consumers about what constitutes a healthy diet and how to achieve a healthy dietary pattern by selecting foods/food groups based on the information provided on the product label.

The 2015-2020 Dietary Guidelines recommendations focus on healthy eating patterns and their food and nutrient characteristics. The healthy eating patterns provide an adaptable framework in which individuals can enjoy foods that meet their nutritional, health, personal, cultural, and traditional preferences (DHHS/USDA 2015). To aid consumers, nutrition education outreach, whether using the Nutrition Facts Label or label claims, should focus on how consumers could achieve a healthy dietary pattern, beginning in childhood and continuing throughout various life stages, in a manner that is convenient and easily incorporated in their busy lifestyles, to prevent the risk of diet-related chronic diseases. The outreach efforts should focus on enhancing consumers' understanding of how a food or beverage product fits into their total healthy dietary pattern (meals and snack(s)), including education about food components to limit (e.g., sugar and salt) and macro- and micro-nutrients to consume (e.g., fiber and vitamin D – shortfall nutrients in the American diet), to maintain their health or to prevent/reduce risk of diet-related chronic diseases.

Further, according to a recent report by the Economic Research Service (ERS), during the past 30 years, the share of U.S. household food budgets spent on foods away from home has grown steadily. The nutritional composition of foods away from home was reported to be consistently of a lower quality than the food prepared at home, across all income levels and all types of foods away from home (except for school foods) (ERS/USDA 2018). Efforts to improve the nutritional quality of foods away from home, in addition to packaged foods is also important to empower consumers to make better and more informed decisions about the purchase and consumption of packaged foods and foods away from home, to foster the development of healthier food options, and to improve public health by reducing the risk of diet-related chronic diseases.

We provide input below for the topics on which the Agency is seeking public comments.

Considering using a standard icon to denote the claim “healthy” on food labels

While IFT does not have comments on whether “healthy” should be denoted by an icon or in any other manner on the food package, IFT believes that if an icon is used to denote “healthy,” it should inform consumers about how the food contributes to help achieve a healthy dietary pattern in a meaningful manner, in addition to informing consumers about other aspects of the food product, such as “nutrient density.” To achieve the goal of conveying consistent and uniform messages and to avoid consumer confusion regarding the term “healthy,” IFT believes that it would be important that the icon be standardized, to ensure that all food and beverage products bearing the “healthy” icon meet the required criteria associated with the definition of “healthy,” which the Agency intends to update. Consumers should also be educated about being mindful of the portion size of the food and beverage products they consume, even for those products that bear the “healthy” icon, and how the product fits into their total diet and eating occasions, as part of a meal or a snack.

Before implementing the term “healthy” and using an icon denoting “healthy” on food and beverage products, we recommend that adequate consumer research be conducted, to determine whether their use will make it easier to select products that can help them achieve a healthy dietary pattern.

Consumer education about what “healthy” means on a food label is crucial because the term is perceived or interpreted differently by consumers. For example, for some consumers the term is perceived in the context of food components to limit (e.g., fat and sugar) or consume more of (e.g.,

whole grains and fiber) and eating style, whereas others perceive “healthy” based on characteristics beyond nutrition, such as limited or no artificial ingredients, ingredient list length, and extent of processing (fresh vs. canned) (IFIC 2016, 2017).

Creating a more efficient review strategy for evaluating qualified health claims on food labels

The existing process for nutrient content and structure function claims seems to be well implemented. An efficient review strategy for evaluating qualified health claims could be a potential incentive for food scientists and technologists, nutritionists/dietitians, and regulatory specialist to develop foods and beverages with attributes that are of interest to consumers. However, the efficient review strategy should not compromise the scientific evidence needed to support the qualified health claim and the review process. The efficient review strategy should still be based on scientific data (e.g., quality and quantity of studies), which should be carefully examined to determine whether there is sufficient scientific evidence to support the qualified health claim.

Nutrition could be an invaluable tool for reducing the burden of many chronic diseases, such as diabetes, heart disease, and certain cancers. In order to innovate food products targeting certain non-communicable diseases, a list of surrogate biomarkers validated for these diseases could help accelerate the innovation of ingredients and food products that benefit the health of Americans. The FDA's guidance for health claim petitions is helpful; however, to facilitate the process, FDA could consider publishing standardized protocols to create high-quality data for scientific review.

Discussing new or enhanced labeling statements or claims that could facilitate innovation to produce more healthful foods and more healthful consumer food choices

The industry is consistently offering a variety of food and beverage products in response to the developments in food and nutrition policies and evolving consumer demands. New labeling statements or claims could potentially further facilitate industry innovation. Consideration should be given, when developing more healthful food and beverage products, about how the product could contribute in a meaningful manner toward achieving and maintaining a healthy dietary pattern and how this information could be communicated to the public, using new or enhanced labeling statements or claims.

Modernizing the standards of identity to provide more flexibility for the development of healthier products, while making sure consumers have accurate information about these food products

Allowing for flexibility with the standards of identity could potentially encourage development of food and beverage products with attributes that could help consumers achieve healthy dietary patterns, without compromising food safety, commonly acceptable characteristics of a given food, and public health. For example, the use of salt substitutes in foods, such as in cheese, could help lower sodium content. Allowing vitamin B12 fortification of products that require mandatory folate fortification could help address vitamin B12 inadequacy among the elderly, who may get an adequate amount of folate but not vitamin B12.

The Agency may want to consider reviewing and examining the standards of identity for foods within each food category, to determine which foods require standards of identity and which of those would benefit from revision. Additionally, it would be worthwhile to consider for which foods standards of identity should be sufficiently flexible to allow for use of new technologies, innovations, and ingredients to develop food and beverage products that are safe, nutritious, convenient, affordable, and sustainable. The Agency may also want to examine the standards of identity of other countries, such as Canada and Australia and New Zealand, for potential harmonization and to perhaps allow for designing food and beverage products for export and import.

Providing opportunities to make ingredient information more helpful to consumers

More than 50% of consumers often or always use the ingredient list when deciding to purchase food and beverage products (IFIC 2018b). The ingredient list should help consumers understand the various components that are present in a given food product. To serve this purpose, commonly used ingredient name(s) along with or instead of the chemical name(s) could be used for ingredients that are added to food during processing, including colors and vitamins. For example, vitamin E and vitamin C could be used instead of the chemical names alpha tocopherol and ascorbic acid, respectively.

To further inform consumers about the purpose of adding ingredients to food products, information regarding the function(s) of an ingredient (e.g., disodium phosphate, a food emulsifier, a substance that is soluble in both fat and water and which enables fat to be uniformly dispersed in water) could be provided through other venues, such as the company's website or SMART label.

FDA's educational campaign for consumers about the updated Nutrition Facts Label

According to the 2018 Food and Health survey (IFIC 2018b), more than half of the respondents look at the Nutrition Facts label often or always, when deciding to purchase a food or beverage product. Educating consumers on the new elements of the Nutrition Facts label could help consumers with making informed food choices to achieve a healthy dietary pattern. The Agency may want to collaborate on certain aspects (e.g., development and dissemination of educational materials) with professional scientific organizations on this effort. We suggest targeting the education efforts to diverse stakeholders, including various age groups, ethnicity, socio-economic status, and cultural background. Methods that could improve use of food labels, such as leveraging label information with health-related goals should be studied (Christoph and others 2018). These insights could help in designing effective educational campaigns.

IFT appreciates the opportunity to provide comments on this very important initiative. We thank you in advance for your consideration of our comments. Please contact Farida Mohamedshah, Director, Food Health & Nutrition (fmohamedshah@ift.org; 202-330-4986), if IFT may provide further assistance.

Sincerely,



Michele Perchonok, PhD, CFS
IFT President, 2018-2019



Christie Tarantino-Dean, FASAE, CAE
Chief Executive Officer

References

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