

Nutrition Facts Labels: A Changing Proposition

The U.S. Food and Drug Administration (FDA) published proposals to update the design and content of the Nutrition Facts label (NFL) and associated serving sizes last month. Some factors driving the FDA changes are undeniable: consumers' expressed desire for the labels to be easier to read and use; continuing obesity and diet-related chronic illnesses drive the need for clearer and more useful information to assist food choices; and nutrition science and food consumption data that supported the 1993 regulations need to be updated.

Consumer research shows that more than half of food shoppers are using nutrition labeling (IFIC, 2013; Todd, 2014). Even so, within the first years of use of the NFL, 70% of consumers wanted the labels to be easier to read and use (Kristal, 1998; FMI, 1995). Evolving nutrition science, including new Dietary Reference Intakes (DRIs), updated nationwide food consumption data, and up-to-date comprehensive, evidence-based *Dietary Guidelines for Americans* (DGA) recommendations warrant changes.

These drivers led FDA to propose changes to the NFL design and format, e.g., greater prominence of calories and servings per container information, removing "calories from fat," and updating the footnote linking to Daily Value (DV) to better explain what it means. Current science supports the proposed changes that include defining "fatty

acids," including "added sugars," and requiring mandatory declaration for potassium and vitamin D (to be consistent with the nutrients of public health concern in the DGA). Current food consumption data and research showing

and serving size rules, and help estimate the impact of the potential changes to DV and how nutrient content claims may be affected. Part of this analysis component is to also determine how to deal with aspects of the

sizes (as opposed to portions), and on nutrient needs.

Manufacturers should also be looking at the NFL changes in a holistic way by considering opportunities for reformulating food products (e.g., to "swap-in"

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that amounts of food consumed by the American public have changed support updated Reference Amounts Customarily Consumed (RACCs) and amending how serving sizes are determined for many foods. Each of these provisions will pose serious challenges for industry.

Understanding that on some level the NFL is destined to change, food manufacturers have a key role in helping to shape the changes. Manufacturers should be poring over the proposals and preparing public comments on the provisions. It is also the time to develop a broader strategy for assessing entire product portfolios based on the likelihood that changes will occur with final rules that could be out by late 2015 and implemented by end of 2017.

A comprehensive approach to know how the proposed changes will affect business plans should include three components. The first is to consider what is likely to be the most impactful aspect of the proposals, the changes in RACCs and related servings sizes. Analyses of the food and nutrient contents will inform the kinds of changes relative to the RACCs

proposals that apply to all labeled foods, i.e., declaring added sugars, and potassium and vitamin D, which will mean new analytical and recordkeeping methods.

The strategy should also include a regulatory perspective by constructing mock-ups of labels modified to reflect the proposed design requirements, to validate claim opportunities, and to answer questions about how to comply with the proposed rules. In particular, manufacturers should consider the implications of the proposed procedures to determine serving size, and the provisions for single-serving containers and dual-column labeling.

The third component of an inclusive strategy should be to develop a roadmap for the company's product portfolio and brand messaging to plan around a new NFL in a way that will effectively communicate to consumers, nutrition educators, and other audiences about the new nutrition information to ensure that products are perceived and used in the way that is intended. Concerted consumer education efforts will be essential on the concepts of added sugars, calories, serving

healthier ingredients), creating new ideas for packaging, new tactics to highlight food groups contributed by products, and new ways to give portion guidance.

The work shouldn't stop there. Aligning ingredients statements and other label features, including romance copy, make the reaction to the NFL proposals a comprehensive undertaking, which should be expected for what will likely be the most extensive nutrition policy change in decades. **FT**

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