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Comments on Docket No. FDA-2024-N-2910 “Proposed Rule: Food Labeling: Front-of-Package Nutrition Information”

Dear Food and Drug Administration,

The Institute of Food Technologists (IFT) is thankful for the opportunity to provide comments on the proposed rule for Front-of-Package (FOP) Nutrition Information. IFT is a global organization of more than 11,000 members who are committed to advancing the science of food. We believe science is essential to ensure the global food system is equitable, sustainable, safe, and nutritious.

IFT commends the FDA on their efforts to empower consumers with nutrition information to assist in making healthy choices in the marketplace. We also support the agency’s commitment to evidence-based policymaking grounded in scientific consensus, including the findings of the recent Dietary Guidelines Advisory Committee. The proposed rule takes important steps to align with the Dietary Guidelines for Americans, and we agree that the ability for consumers to find and interpret label information is critical in helping them identify healthy foods.

Our comments focus on the importance of alignment with existing regulations to reduce consumer confusion and streamline industry compliance. The proposed rule notes the need to harmonize with existing regulations and avoid inconsistencies within the label, such as adjusting low sodium and low saturated fat claims to align with the FOP label. We commend the FDA for this approach and encourage a thorough evaluation of how the FOP label will interact with other labeling systems, both longstanding and newly implemented.

For example, the current proposed rule notes that the current 20% reference value for “high in saturated fat” is aligned with current disclosure thresholds for nutrient content and authorized health claims. However, the proposed rule does not clarify if the front of pack label would satisfy the need for disclosure or if an additional statement is needed. We would also recommend additional consumer testing to determine if a nutrient content claim on a product that says “high in” saturated fat, sodium, or added sugar may cause confusion.

We also recommend the FDA address the alignment of the FOP label system with the criteria for the use of the “healthy” claim. As these labeling initiatives converge in the future, it will be critical to understand how a FOP label and a healthy icon may interact to influence consumer behavior. For example, some foods, such as nuts, seeds, and soy products may still qualify as healthy even if they are considered “high in” saturated fat as the saturated fat in the nut or seed will not count towards the saturated fat limits to qualify for healthy. In the proposed rule it is unclear if a similar approach will be taken with the FOP label, such that saturated fats from nuts or seeds would not count toward the limit. This inconsistency could result in mixed messaging on the package (e.g., a product labeled healthy with “high in” saturated fat on the FOP label). If exceptions are made, it will also be important to consider how the FOP label aligns to the nutrition facts panel on the back of the package. Ensuring alignment among the different labeling rules is critical to prevent misinterpretation and ensure consumer trust in food labels.

While not within the scope of the current proposed rule, we encourage FDA to consider how menu labeling regulations may be harmonized with this FOP label approach in the future to empower consumers to make informed dietary choices in all environments. Consumer spending on food away from home has now surpassed spending on food at home and continues to grow, emphasizing the need for consistent nutrition communication in both retail and food service settings. While current menu labeling regulations for chain restaurants require the display of calorie information, additional nutrient information is only available upon request or online. Further there is no proposed rule to require labels for menu items high, medium, or low in saturated fat, added sugar, or sodium, similar to this rule for packaged foods. This inconsistency limits the potential of labeling initiatives to guide consumer behavior across all food settings, making it more challenging to nudge consumers toward healthier choices through labeling initiatives.

IFT appreciates the opportunity to provide these comments on the proposed rule for front-of-package labeling and we support the FDA in their efforts to empower consumers with science-based nutrition information. Thank you for considering our input. Please contact Anna Rosales, Senior Director Government Affairs and Nutrition (arosales@ift.org) if IFT may be of further assistance.

Sincerely,

Anna Rosales
Senior Director Nutrition and Government Affairs
Institute of Food Technologists