

March 27, 2023

TO: Dockets Management Staff (HFA-305)
Office of Management and Operations
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: Agency Information Collection Activities; Proposed Collection; Comment Request;
Quantitative Research on Front of Package Labeling on Packaged Foods [[Docket No FDA-2023-N-0155](#)]

The [International Food Information Council \(IFIC\)](#) appreciates the opportunity to submit public comments to the U.S. Food and Drug Administration (FDA) on the proposed quantitative research to study consumer responses to various Front of Package Labeling (FOPL) schemes.

IFIC is a §501(c)(3) nonprofit educational organization with a mission to effectively communicate science-based information about sustainable food systems, with a focus on food safety and nutrition. One of IFIC's objectives is to elevate the understanding of Americans' eating habits and attitudes toward nutrition and food labeling through consumer research, which we have been conducting for decades. We view consumer research as a critical first step in 1) determining consumer understanding of these issues and 2) examining how knowledge, perceptions and attitudes can impact behavior. IFIC's signature consumer research effort is its annual [Food and Health Survey](#), an online survey of over 1,000 Americans ages 18 to 80, now in its 18th consecutive year. IFIC also frequently conducts consumer research that offers insights on a range of specific food-related topics. These research endeavors not only assist in helping to understand consumer viewpoints and behaviors, but they also support the development of educational resources and strategies that can be used to bridge knowledge gaps for the American public.

In recent years, IFIC has conducted consumer research to understand Americans' perspectives on "healthy" foods and eating patterns, which a standardized, evidence-based FOPL scheme will invariably intersect with. IFIC submitted [public comments](#) in July 2021 that included our "healthy" consumer research findings and suggestions for conducting quantitative research on a voluntary "healthy" symbol on packaged foods. In these March 2023 comments, we focus on results from IFIC's FOPL quantitative research, "[Knowledge, Understanding and Use of Front-of-Package Labeling in Food and Beverage Decisions: Insights from U.S. Shoppers](#)" (IFIC FOPL 2021).¹

IFIC is supportive of FDA's efforts to engage in consumer research to inform future rule-making decisions such as the utility of a standardized, evidence-based FOPL scheme. We recognize the need to continually assess the use and interpretation of food labeling information, its impact on purchasing, and the potential for information found on food packaging to influence overall eating patterns. As such, IFIC encourages the FDA to publicly release the results of recently conducted qualitative focus groups and quantitative data collections on a voluntary "healthy" symbol and FOPL schemes as soon as is reasonably possible.

¹International Food Information Council. Knowledge, Understanding and Use of Front-of-Pack Labeling in Food and Beverage Decisions: Insights from U.S. Shoppers. 16 November 2021. <<https://foodinsight.org/ific-survey-fop-labeling/>>

The following comments highlight results from IFIC's FOPL 2021 consumer research and offer our perspective on various research design elements to strengthen the FDA's proposed quantitative FOPL consumer research.

FOPL impacts purchasing decisions, but the influence is higher for some

It is well documented that disparities in diet quality by race/ethnicity, education status, income level and other sociodemographic factors play a role in overall health and in health and label literacy.^{2,3} IFIC encourages FDA to use research methods that appropriately capture the viewpoints of economically disadvantaged individuals, minorities, and those for whom English is a second language (for example, by oversampling specific subgroups).

The IFIC FOPL 2021 research found that 54% of Americans said that "nutrition labels and claims on the front of product packaging" impacts their decision to buy foods and beverages. However, when exploring the demographics, the impact of FOPL information appears to be higher among certain groups. IFIC survey data showed that those under the age of 50, with household incomes of over \$75,000, parents of children under 18, and those who self-reported being in excellent or very good health were more likely to say that FOPL labels and claims were impactful in their decision-making. The age divide in our survey is perhaps most dramatic – 61% of those 18-34 and 66% of those 35-49 are impacted by FOP labels, while the same is true for only 42% of consumers age 50+.

With healthier, more affluent segments of our sample more commonly reporting that FOPL impacts their purchasing decisions, many people within these segments may need less targeted nutrition and FOPL education. As the FDA conducts this research to inform the potential development of a standardized, evidence-based FOPL scheme and subsequent education campaigns, it is imperative that diverse voices within our nation are adequately captured to identify the subsets of our population that are already influenced by FOPL, or who may be skeptical of, unfamiliar with, or have difficulty interpreting and applying FOPL schemes, especially those who depend on packaged foods the most.

Attention paid to FOPL varies by type of food product and familiarity with it

The proposed FDA FOPL consumer research may reveal that consumers respond more positively or negatively to specific attributes, claims, food groups, icons, ingredient or nutrient information on individual food and beverage packaging. It will be important for FDA to also recognize that consumer reactions to FOPL schemes may vary according to product type, whether a product carries a claim, and whether an individual has previously encountered or purchased that product.

As such, we recommend that FDA carefully consider the data collected on each of the three types of proposed mock food products (i.e. breakfast cereal, frozen meal, and canned soup), and compare reactions across these products as well. It is essential that FDA compare consumer reactions to FOPL schemes across multiple foods categories so that the FDA can assess whether reactions to standardized FOPL schemes have the potential to significantly shift perception, purchasing, or consumption of certain products, shift food group or nutrient intakes – both those that are encouraged to consume more of and those that are recommended to limit, thus potentially influencing overall eating patterns.

The IFIC FOPL 2021 research revealed that more than half of consumers (57%) were more likely to pay attention to the labels/claims on new and unfamiliar products. When consumers

²National Center for Health Statistics (US). Health, United States, 2015: With Special Feature on Racial and Ethnic Health Disparities. Hyattsville (MD): National Center for Health Statistics (US); 2016 May. Report No.: 2016-1232. PMID: 27308685.

³Moore SG, Donnelly JK, Jones S, Cade JE. Effect of Educational Interventions on Understanding and Use of Nutrition Labels: A Systematic Review. *Nutrients*. 2018;10(10):1432. Published 2018 Oct 4. doi:10.3390/nu10101432

who consider FOPL information were presented with fourteen (14) distinct types of food and beverage categories, most consumers reported always or often reviewing FOPL on four: 100% fruit and vegetable juices (55%), dairy (53%), breakfast cereals (52%), and savory or salty snacks (50%). By contrast, candy and chocolate (25%); meat, poultry, or seafood (20%); desserts and sweet snacks (18%); and savory or salty snacks (18%) were the food categories with the highest reports of people rarely or never paying attention to FOPL information.

In addition to breakfast cereals, the IFIC FOPL 2021 research included the two other food products that the FDA has proposed for use in their consumer data collection: canned soup and frozen meals.

- 49% of consumers reported always or often paying attention to nutritional labels/claims for canned soup, while 14% reported rarely or never paying attention.
- 47% reported always or often doing so for frozen meals, while 13% reported rarely or never paying attention.

FOPL is viewed as helpful in a variety of ways—mostly for informing food choices, and less for knowing what nutrients to consume more or less of

In the IFIC FOPL 2021 research, when asked what nutritional labels and claims on the front of food and beverage product packaging help with, consumers most often said that FOPL information helped them stay broadly informed, as opposed to driving targeted action on a specific nutrient.

- Most consumers said that FOPL helped them to “make more informed choices for yourself (32% saying so), followed closely by FOPL helped them to “gain general awareness of the healthfulness of a food or beverage” (29%) and “quickly access information on the nutrition content of foods and beverages” (28%).
- 25% of survey takers said that FOPL helped them focus on specific nutrients. The same percentage (25%) said that FOPL helps them establish a healthy eating pattern.
- Far fewer said that FOPL helped them to “know what nutrients you should limit/avoid” (20%) and “know what nutrients you should consume more of” (17%).

According to IFIC’s survey respondents, the hardest part of determining the healthfulness of foods and beverages was, “calculating portion/serving sizes and nutrition content (calories, sugars fats)” (15%), “truthfulness/accuracy of claims and credibility of company” (12%) and general lack of knowledge (what to look for, what healthy means, etc.)” (11%). Sixteen percent (16%) indicated that they did not find anything hard about determining the healthfulness of a food or beverage.

Consumers do not want more FOPL information, they want consistent information

One intention of FOPL is to ease the burden on consumers who wish to quickly access nutrition information. To accomplish this, relevant information from the ingredient list and the Nutrition Facts label – which are found on the side or back of most packaging – is often brought to the front of the package so that it is in full view while the product is displayed on store shelves. But real estate on the front of food packaging is limited for many products, so the benefits and burdens of a standardized FOPL scheme must be evaluated, particularly for food categories and individual products with more limited space available on packaging.

In the IFIC FOPL 2021 research, we asked consumers about their thoughts on the amount of information that is currently on food packaging and what they would prefer to see.

- 2 in 3 (67%) said they believe that the front of food and beverage packaging contains the right amount of information.

- 1 in 3 (33%) believe there should be a different amount of information on the front of packaging, with opinions evenly split about whether there is too much information (16%) or not enough (16%).
- 46% said it is hard to know which labels and claims on the front of package are most important. Gen Z, Millennials, those with higher incomes (>\$75,000), those with children under 18, and those who say that FOPL is impactful in their purchasing decisions were more likely to report this.
- 41% said that the amount of information found on the front of food and beverage packaging is overwhelming. Gen Z, Millennials, those with children under 18, and those who self-report being in excellent/very good health were more likely to report this.

When diving deeper into consumer opinions about what they would prefer to see on the front of food and beverage packaging:

- Consumers had the strongest preference for “multiple symbols/graphics that highlight specific nutrition facts” (31% saying so).
 - This was followed by “a single symbol that indicates a product is a healthy choice” (25%) and “a single symbol that rates the product on a scale ranging from healthy to unhealthy” (18%).
 - Consumers were least interested in “a single symbol that indicates a product is an unhealthy choice” (9%).
 - Eighteen percent (18%) responded that they prefer none of the four options listed above.
- While 5 in 10 (52%) are very/extremely interested in having nutrition information presented in a consistent way on the front of all food and beverage packaging, 7 in 10 (71%) at least somewhat agree that “if nutrition information was presented in a consistent way on the front of all food and beverage packaging, it would make it easier to make healthy choices.”

IFIC’s consumer insights have helped Federal agencies, including the FDA, non-governmental organizations, and the private sector, tailor nutrition education and messages so that the public can better understand how to make informed dietary choices and build healthy eating patterns. With more food information available today than ever before, criteria for a potential standardized, science-based FOPL scheme must reflect the best and most currently available evidence, including consumer research results from organizations like IFIC, data collection efforts like the current FDA proposal, published results in peer-reviewed literature about the effects of food labeling on nutrient intake, and the considerations put forward in our comments. Lastly, research methods and outcomes from exploring consumer reactions to potential FOPL schemes should be thoughtfully developed to ensure that the needs of our most vulnerable populations are addressed.

IFIC looks forward to future opportunities to support the FDA’s nutrition strategies that help Americans make more informed food choices to improve their health.

Sincerely,



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