



November 18, 2021

Food and Drug Administration
“New Era of Smarter Food Safety Summit on E-Commerce”
Public Meeting—Request for Comments
[Docket No. FDA-2021-N-0929](#)
<https://www.regulations.gov/>

Dear Madam or Sir:

In response to the FDA’s “New Era of Smarter Food Safety Summit on E-Commerce: Ensuring the Safety of Foods Ordered and Delivered Directly to Consumers,” the International Food Information Council (IFIC) would like to submit the following comments.

We applaud the Agency for choosing to supplement the record of the summit with the public comments docket. We also commend you for many of the basic precepts underlying the summit and the FDA’s “Blueprint for the Future” — in particular, the urgency of fostering and promoting a culture of food safety up and down the food supply chain; the acknowledgment that leveraging technology is central to achieving the safest possible food supply; and the Agency’s concerted engagement of a broad spectrum of stakeholders, including industry, public health and advocacy organizations, regulators at all levels of government both at home and abroad, and the academic community.

As brick-and-mortar sales are increasingly joined side by side with “click-and-collect” Business to Consumer (B2C) models, the need for insights into consumer attitudes and behaviors around the evolving role of e-commerce in food purchases and food safety becomes more critical than ever before. We believe that IFIC is uniquely positioned to offer some of these insights.

Our comments are intended to provide the FDA with some of the most salient findings from our decades of consumer research — especially those around purchase behavior and intent regarding the use of e-commerce platforms. We seek to encourage a collaborative public education initiative that is suitable for a diverse American population of primary shoppers — in particular, Baby Boomers and older Americans, whose purchasing power continues to drive our economy.

IFIC is a §501(c)(3) non-profit educational organization with a mission to effectively communicate science-based information about health, nutrition, food safety and agriculture. We are staffed by science communicators across a broad spectrum of food and nutrition subjects, and our work benefits from research and input from top experts in academia, government and the private sector.

Food Safety Research

One of the objectives of IFIC is to understand public perceptions by conducting consumer research. Our flagship research product is the annual [Food and Health Survey](#), an expansive study we have fielded and released every year since 2006. In addition, we conduct numerous other surveys specific to topics or populations of interest.

The *Food and Health Survey* has examined a variety of food safety issues. For almost the entire history of the survey, it has tracked trends around consumer confidence in the safety of the food supply (*Figure 1*). From a historic high of 78% in 2012¹, confidence fell precipitously to 61% by 2015, then rebounded and has remained steady at about two-thirds of Americans from 2018 to 2021.²

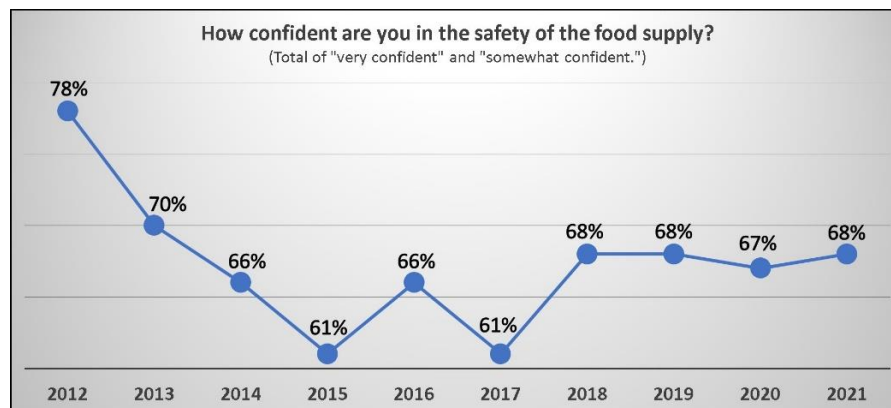


Figure 1: IFIC Food and Health Survey, 2012 – 2021

In 2020, IFIC conducted the survey “,” which further delved into consumer trust in and concerns about the food safety system.³

The issues about which Americans are “very concerned” when it comes to food safety are food becoming contaminated (46%), food poisoning/foodborne illness (45%), meat that is cooked to a safe internal temperature (45%), making sure food is cooked according to directions (40%) and the presence of allergens (39%). In addition, consumers feel far more confident that they can always control the safety of food prepared at home (66%) than food consumed away from home (17%).³

Online Purchasing Research

As people age, their nutritional needs and dietary preferences change. But few have examined the shopping habits and eating patterns of Americans ages 50-plus — the country’s fastest-growing demographic. To that end, IFIC, in partnership with the AARP Foundation, conducted an oversample of respondents ages 50–80 for the 2017 *Food and Health Survey* to help uncover insights into the diets and health of older Americans, with a special focus on their online purchasing behaviors and attitudes.⁴

¹ IFIC, 2012 *Food and Health Survey Executive Summary*

<https://foodinsight.org/wp-content/uploads/2012/05/FINAL-2012-Food-and-Health-Exec-Summary.pdf>

² IFIC, 2021 *Food and Health Survey*, <https://foodinsight.org/2021-food-health-survey/>

³ IFIC, *Food Safety: Consumer Trends, Habits and Attitudes*

<https://foodinsight.org/consumer-survey-trends-habits-and-attitudes-related-to-food-safety/>

⁴ IFIC, 2017 *Food and Health Survey: A Focus on 50+*

<https://foodinsight.org/2017-food-and-health-survey-a-focus-on-50/>

Only about 1 in 6 Americans age 50+ (16%) order groceries to be delivered or to be picked up from a store. For consumers age 50+, prepared-meal delivery, meal-kit delivery, grocery delivery and grocery pick-up services also tend to be infrequent. Depending on the service, between 60% and about 80% report using them once a month or less (*Figure 2*). Comparatively, more than 60% report visiting any type of grocery store in person at least once a week.

Those who have ordered groceries to be delivered are much more likely also to participate in the other alternatives, such as ordering groceries for pick up (43%), from a prepared meal delivery service (35%), and a meal kit delivery service (25%).

In soliciting public input, the FDA asked, “What labeling information is important for consumers to have access to when using the online grocery shopping platforms ... ?” While labels about sodium, sugar and fat content receive roughly equal attention, those ordering groceries are particularly attentive to labels related to how food is produced (use of hormones or steroids, “natural,” raised without antibiotics, non-GMO, organic, etc.)

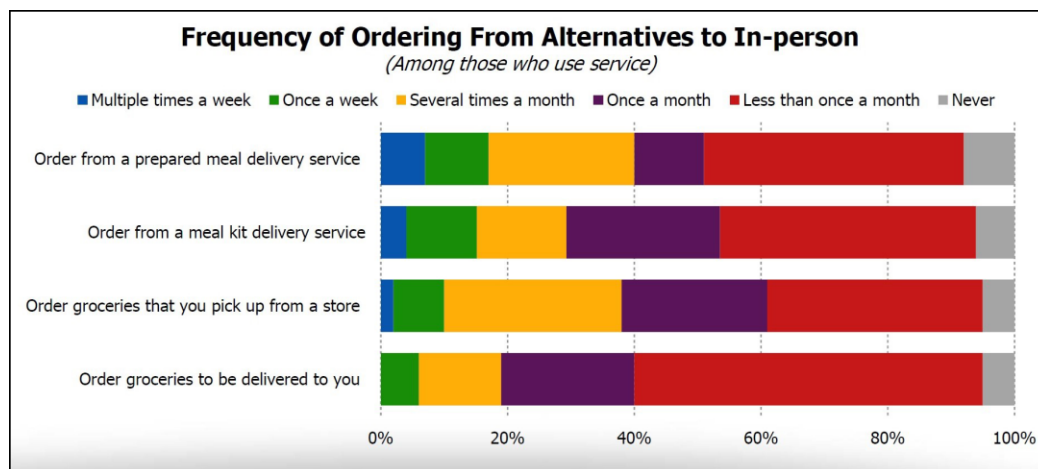


Figure 2: IFIC 2017 Food and Health Survey: A Focus on 50+

Further, three-quarters of those ordering online take the time to read nutritional labels, compared to a little more than half of the general population.

Despite the interest in labels and packaging information among older Americans who order groceries for delivery, they find it much more difficult in general to identify product and packaging labels when ordering online as compared to in person.

Household staples not for consumption like cleaning and paper products, followed by canned food and packaged pantry items, are the most ordered products, and they also are the ones consumers are most comfortable ordering (*Figure 3*).

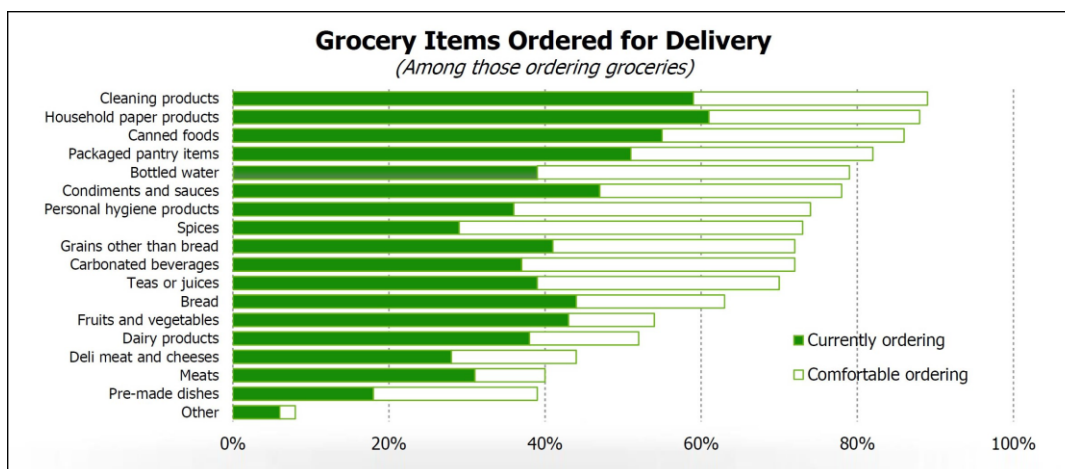


Figure 3: IFIC 2017 Food and Health Survey: A Focus on 50+

The survey also asked about consumers' motivations for and barriers to ordering online groceries. Not having to deal with the physical and time constraints of in-person shopping are the top motivators for older Americans to shop online (Figure 4).

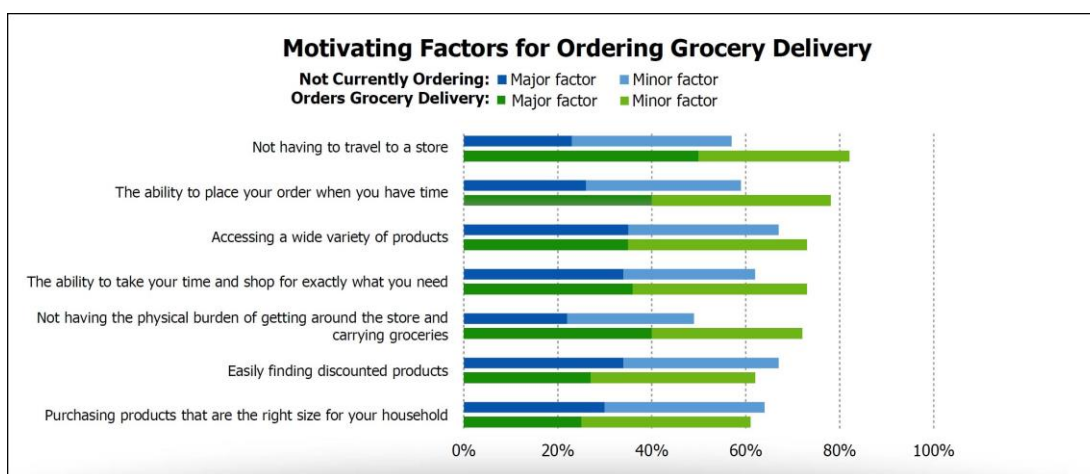


Figure 4: IFIC 2017 Food and Health Survey: A Focus on 50+

Some of the top barriers to online grocery ordering include fees, a perceived lack of quality, and the desire to see/touch foods. However, safety concerns about home delivery were relatively low, with just 1 in 5 older Americans overall expressing such concerns, and only about half that number among those who already buy groceries online.

From finding discounts and preferred brands to reading nutrition labels, few older Americans believe grocery shopping online for delivery is easier than in-person. Though most express skepticism about shopping online, a sizable minority believe it to be easier to stick to a healthy shopping list when shopping online (Figure 5).

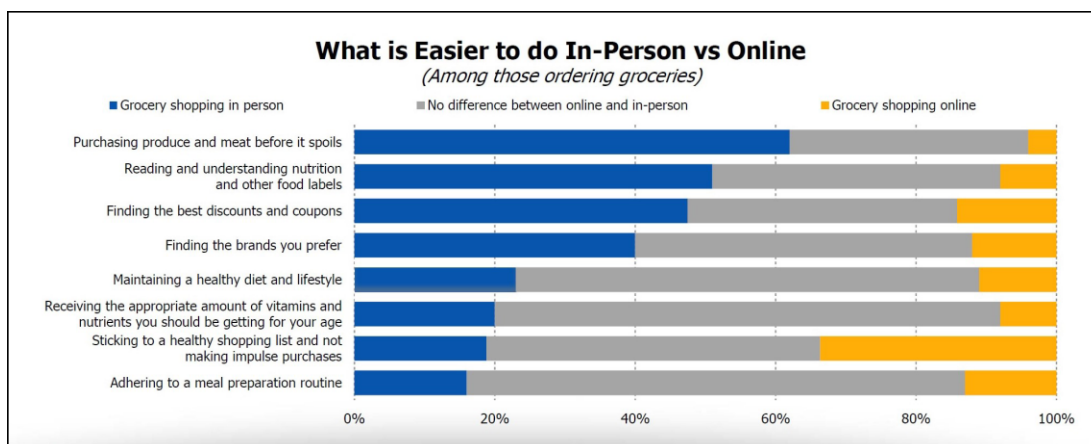


Figure 5: IFIC 2017 Food and Health Survey: A Focus on 50+

Guaranteeing quality and fair prices are the most likely way potential and current customers would be encouraged to overcome barriers. About 2 in 3 older Americans say personally inspected produce, guaranteed delivery time frame, special coupons, and loyalty programs would encourage them to order online. Current customers are especially encouraged by loyalty programs (Figure 6).

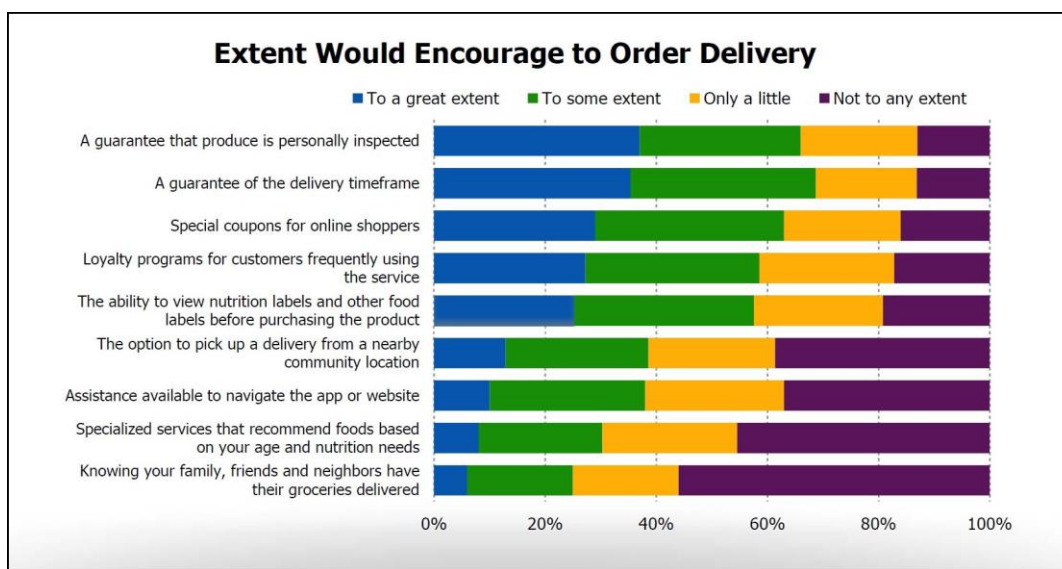


Figure 6: IFIC 2017 Food and Health Survey: A Focus on 50+

Pandemic's Effects on Purchase Patterns

Early in the COVID-19 pandemic, some wondered whether the radical changes so many Americans experienced in their food purchasing and consumption habits would be short-lived or would prove more durable. While the *2020 Food and Health Survey*, conducted in April 2020, revealed dramatic changes in how we ate, prepared and shopped for foods as a result of COVID-19, the *2021 Food and Health Survey* proved that some of those shifts were more ephemeral—especially where online purchasing was concerned.⁵

⁵ IFIC, *2021 Food and Health Survey*, <https://foodinsight.org/2021-food-health-survey/>

For example, 27% of Americans in 2019 said they shopped for food online at least once a month. That number increased to 33% in 2020 in the early days of COVID-19. But a year later, in 2021, it climbed even higher to 42%.

Similarly, 13% of adults in 2019 said they shopped for food online at least weekly, a number that decreased slightly to 11% in 2020 but jumped to 20% in 2021. Younger consumers, African Americans and parents of children under 18 tended to grocery shop online more frequently than their counterparts. Nearly half (46%) of those who grocery-shop online always or often pay attention to food labels when shopping.

Another result of COVID-19: 14% of Americans in 2021 reported getting more of their meals by delivery or takeout than they had before — the same number as in 2020 — suggesting a more lasting change in our buying habits.

Since the pandemic began, IFIC has conducted frequent surveys to gauge changes in attitudes and behaviors around food. In our February 2021 survey, about one-third (34%) of Americans reported grocery shopping online more often in the wake of the pandemic. Of those who reported online grocery shopping more often, 38% think that they will buy groceries online more often when the pandemic subsides and 32% said that they will keep doing what they are doing now.⁶

In April 2020, 16% of Americans said that they shopped online for groceries to feel comfortable with the safety of their food, a change that has proved to be lasting. It increased to 24% in May 2020 and decreased only slightly to 20% in June 2020. The number was virtually unchanged in August 2020 (21%) and again in June 2021 (20%).⁷

Conclusion

E-commerce is revolutionizing what foods Americans purchase and consume, and how they do so. But not everyone is experiencing the same benefits yielded by this progress.

The aging of Baby Boomers is resulting in an older population overall, with 34.2% projected growth in the population age 65+ between 2010 and 2020 alone.⁸

It is vital that policymakers be aware of the disparate needs of consumers, no matter their age, as they consider changes that are intended to modernize food safety. Such changes must be the product of an ongoing dialogue that keeps the consumer front and center. They should also be the subject of intensive public outreach and education so that we can have a food system that meets the demands of the future — for the benefit of every American.

Thank you for the opportunity to provide our comments on this topic of critical importance.

⁶ IFIC, *COVID-19 Survey: February 2021*

<https://foodinsight.org/wp-content/uploads/2020/12/COVID-19-Questions.February-2021.pdf>

⁷ IFIC, *COVID-19 Survey: June 2021*, <https://foodinsight.org/wp-content/uploads/2021/03/COVID-19.June-2021.pdf>

⁸ U.S. Census Bureau Releases 2019 Population Estimates by Demographic Characteristics, <https://www.census.gov/newsroom/press-releases/2020/65-older-population-grows.html>

Sincerely,

A handwritten signature in black ink, appearing to read "Tamika D. Sims". The signature is fluid and cursive, with the first name "Tamika" being more prominent than the last name "Sims".

Tamika D. Sims, PhD
Sr. Director, Food Technology Communications, IFIC

A handwritten signature in black ink, appearing to read "Joseph Clayton". The signature is fluid and cursive, with the first name "Joseph" being more prominent than the last name "Clayton".

Joseph Clayton
Chief Executive Officer, IFIC