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Comments on Docket No. FDA-2023-N-0155 “Agency Information Collection Activities; Proposed Collection; Comment Request; Quantitative Research on Front of Package Labeling on Packaged Foods”

Dear Food and Drug Administration,

The Institute of Food Technologists (IFT) is thankful for the opportunity to provide comments on the proposed quantitative research on front of package labeling. IFT is a global organization of approximately 12,000 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 help empower consumers with nutrition information to make healthy choices in the marketplace. We agree that a standardized, science-based front of pack (FOP) labeling scheme could help some consumers identify healthy foods. The proposed randomized, controlled, qualitative experiment is an appropriate next step to evaluate consumers’ understanding of the labels and ability to utilize the labels to make healthy choices.

We also recognize that this study has limitations in that it only assesses purchase intentions and not actual purchase or consumption behaviors. Therefore, we caution the FDA against pursuing rulemaking for FOP labeling based on the results of this study alone. Research has shown there is often a considerable gap between consumer’s purchase intention and actual purchasing and consumption behavior^{1,2,3}. This is likely due to multiple factors and trade-offs that consumers must consider when buying and consuming food, such as taste, brand, pricing, price

¹ Castro, I.A.; Majmundar, A.; Williams, C.B.; Baquero, B. Customer Purchase Intentions and Choice in Food Retail Environments: A Scoping Review. *Int. J. Environ. Res. Public Health* 2018, 15, 2493.

<https://doi.org/10.3390/ijerph15112493>

² Batista, M. F., de Carvalho-Ferreira, J. P., Thimoteo da Cunha, D., & De Rosso, V. V. (2023). Front-of-package nutrition labeling as a driver for healthier food choices: Lessons learned and future perspectives. *Comprehensive Reviews in Food Science and Food Safety*, 22, 535– 586. <https://doi.org/10.1111/1541-4337.13085>

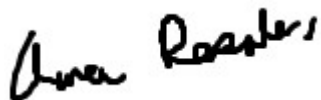
³ Niessen, J. & Hamm, U. (2008). Identifying the gap between stated and actual buying behaviour on organic products based on consumer panel data. *Cultivating the Future Based on Science: 2nd Conference of the International Society of Organic Agriculture Research ISOFAR, Modena, Italy, June 18-20, 2008.*

promotions, product attributes, shelf display, sampling, and personal factors (e.g., reward, personal health needs). To best determine the potential effectiveness of FOP labeling schemes for behavior change, testing in real-world or simulated shopping environments is needed. Further investigations into actual consumption in the home would also be helpful. A recent review reported FOP labeling increased the purchase of healthier foods, but the evidence was inconclusive as to actual improvements in healthy food consumption⁴, demonstrating the importance of these studies on behavior prior to large scale implementation of FOP labels. The current proposed study could help inform these future studies.

We also encourage the FDA to consider other proposed rulemaking on food labeling currently being pursued by the FDA, particularly the definition of healthy and a potential on-pack healthy icon. 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. Certain food component limits for the healthy claim may vary from the %DV method currently included in the FOP label scheme. For example, if saturated fat from nuts is not included in the saturated fat limit for the healthy claim, as currently proposed, it is possible that a nut-based food may have a FOP label stating high in saturated fat (color red) but also have a healthy icon. This could confuse consumers and we recommend close alignment of the development of these labeling initiatives and testing of both labels on pack to help minimize confusion and ensure consumer trust in food labels.

IFT appreciates the opportunity to provide these comments on the proposed quantitative research on FOP labeling on packaged foods. We thank you for considering our comments. Please contact Anna Rosales, Senior Director Government Affairs and Nutrition (arosales@ift.org) if IFT may be of further assistance.

Sincerely,

A handwritten signature in black ink that reads "Anna Rosales". The signature is written in a cursive, slightly slanted style.

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

⁴ Croker, H., Packer, J., Russell, S., Stansfield, C. & Viner, R.M. (2020) Front of pack nutritional labelling schemes: a systematic review and meta-analysis of recent evidence relating to objectively measured consumption and purchasing. *J Hum Nutr Diet.* 33, 518– 537 <https://doi.org/10.1111/jhn.12758>