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Date: July 14, 2023

RE: Comments on Docket No. FDA-2023-N-0155 “Agency Information Collection Activities; Submission for Office of Management and Budget Review; Comment Request; Quantitative Research on Front of Package Labeling on Packaged Foods”

Submitted to: <https://www.reginfo.gov/public/do/PRAMain>

Dear Office of Management and Budget,

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 read with interest the FDA response to the previous comments received during the collection of information. The proposed changes to the study design, such as increasing the subject number, will improve the quality of the study. We also understand and agree with the rationale that this preliminary study is only meant to understand “general consumer responses to the schemes presented” and therefore, will not test consumer behavior, such as purchasing decisions in real-world environments or in-home use. However, we reiterate our earlier caution that this limitation of the study should be acknowledged and future proposed rulemaking for FOP labeling should not be 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

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.*

must consider when buying and consuming food, such as taste, brand, pricing, price promotions, product attributes, shelf display, sampling, and personal factors (e.g., reward, personal health needs). Further investigations in real-world environments and actual consumption in the home would be helpful to inform proposed rulemaking.

FDA also declined to consider the effect of other packaging elements, such as the proposed healthy label, in the study. While we understand this will simplify the study, again it does not reflect the real-world environment of food packaging which may include multiple labels and claims. We understand this rationale, but caution that before pursuing any proposed rulemaking based on this study, the interaction of the proposed FOPL with other labels, such as the healthy icon, be investigated.

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,

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