

Summary of Themes Heard from Stakeholders during Breakout Sessions at the Public Meeting on FDA's Comprehensive, Multi-Year Nutrition Innovation Strategy

Hosted July 26, 2018

Background

On July 26, 2018, the U.S. Food and Drug Administration (FDA) held a public meeting entitled "FDA's Comprehensive, Multi-Year Nutrition Innovation Strategy", at the Hilton Washington DC/Rockville Hotel, 1750 Rockville Pike, Rockville, MD 20852.

The meeting gave participants an opportunity to discuss and provide input on FDA's Nutrition Innovation Strategy, including: a standard icon or symbol for the claim "healthy"; a more efficient review strategy for evaluating qualified health claims; statement or claims that could facilitate innovation to promote healthful eating patterns; approaches for modernizing standards of identity; possible changes that could make ingredient information more consumer friendly; and FDA's educational campaign for consumers about the updated Nutrition Facts label. We also requested public comment on FDA's Nutrition Innovation Strategy in the [notice announcing the public meeting](#) (80 FR 30180, June 27, 2018). The comment period is open through October 11, 2018 and the docket number is [FDA-2018-N-2381](#).

The meeting included introductory remarks from FDA leadership and presentations on consumer trends in the marketplace as well as the evolving food landscape and industry innovation that featured an industry representative, a consumer advocacy representative, and an academic professional. Stakeholder participation included 300 in-person participants and 609 webcast viewers for a total of 909 attendees.

During the meeting, we held two rounds of three breakout sessions (summarized below), giving participants an opportunity to choose which two breakout sessions to attend.

1. **Claims and Statements Used on Food Labels/Icon for "Healthy"** focused on how claims and other nutrition-related labeling statements can provide consumers with the information they need to make healthful choices and may facilitate innovation to produce more healthful foods. The session also covered how FDA can make its review process for qualified health claims more efficient, and how a standard icon or symbol for the claim "healthy" could assist consumers with healthful eating patterns and potentially facilitate innovation.
2. **Nutrition Facts Label Consumer Education Campaign** focused on FDA's educational campaign for consumers about the updated Nutrition Facts label that consumers will be seeing in the marketplace.
3. **Modernizing Standards of Identity/Ingredient Lists on Labels** focused on how FDA can modernize its standards of identity program as well as how ingredient statements can be more user-friendly and continue to comply with statutory requirements.

Key Themes Raised by Participants During Breakout Sessions

The themes, perspectives, and ideas that participants raised during the breakout sessions are summarized below. These summaries do not necessarily represent the viewpoint of the Agency.

Breakout Session 1: Claims and Statements Used on Food Labels/Icon for "Healthy"

Claims and Statements Used on Food Labels

- **Use of claims is consumer driven.** Participants stated that the primary factor for food manufacturers in deciding whether to use a claim is based on consumers' reception of the claim. Food manufacturers conduct extensive consumer testing of claims. If consumers are interested in a certain claim, food manufacturers will use it when possible, and even reformulate their products in order to bear a claim that is in consumer demand. For certain products, there are some claims consumers associate with a less desirable taste, such as "low sodium" that food manufacturers, consequently, avoid using. Food companies also take into consideration regulatory and litigation issues and their company's own nutrition policies when deciding to use a claim.
- **Claims should focus on overall eating patterns, be positive and easy to understand.** Participants stated that these kinds of claims will help drive innovation among food manufacturers and help consumers select foods consistent with dietary recommendations. Claims should be simple, positive, focus on food groups, and indicate how the product contributes to a consumer's overall eating pattern. More guidance on the amount of a food that a product must contain in order to bear a claim related to dietary patterns or food categories is desired. Additionally, an icon, such as the MyPlate, could help consumers understand how a food contributes to their whole diet.
- **Regulatory framework should ensure claims are science-based.** Participants stated that the scientific review and strength of evidence for health claims is critical to ensure claims that food manufacturers use convey science-based information. FDA should ensure the integrity of the science is not compromised in any efforts to make their review process of claims more efficient.

Icon for "Healthy"

- **Icon could be very beneficial.** Participants stated that a "healthy" icon could be very helpful for consumers, particularly those with low-literacy/numeracy skills and when consumers are comparing products within a food category. An icon with an image will likely be more effective than one with only text.
- **Issues and questions to explore.** Participants stated that while an icon may be helpful to some populations, it may not be useful for other populations with certain chronic conditions. FDA will need to consider: whether an icon can reflect how a product contributes to an overall diet; whether industry would use it; if there will be competition with other existing icons; and how the icon will reflect information on portions and how often the product should be consumed. The location of the icon will also be important to consider, including whether FDA should require a specific location on the label or if food manufacturers should have flexibility to decide where it appears on the label. Other tools, such as a QR code, should be considered, especially in today's digital age.
- **Steps to take in developing an icon.** Participants stated that before FDA develops an icon for "healthy," the agency should update the criteria for the nutrient-content claim "healthy." FDA should also conduct extensive consumer testing on the icon, explore what other countries are doing regarding nutrition-related icons, and conduct consumer education to make sure it is impactful.

Session 2: Nutrition Facts Label Consumer Education Campaign

Nutrition Facts Label Education Campaign

- **Leverage other nutrition education programs and networks.** Participants stated that there are a variety of public health education campaigns and networks that FDA can leverage and model their Nutrition Facts Label Education Campaign after. For example, USDA's MyPlate National Strategic Partnership is a collaborative public health education initiative that focuses on promoting improved nutrition. Additionally, FDA can amplify their education efforts through some of the following networks: MyPlate Partner Network, SNAP-Ed; WIC; federal, state, and local government partners; professional associations; health and nutrition educator organizations; K-12 school organizations; healthcare organizations; grocery and corner stores; food banks; and community and faith-based organizations.
- **Focus on messages that are simple and positive.** Participants stated that personalized and tailored messages that are relatable and positive will be most impactful. FDA can personalize messages by creating different sections on FDA's website for different audiences, having tailored advertisements placed on websites and on YouTube, and linking the use of the Nutrition Facts label to health impacts. It will also be important for FDA to use straightforward, simple messages that will resonate with a broad audience in its campaign and can be shared by an array of individuals. There were diverse opinions on whether the education messages should focus on the updated Nutrition Facts label or on healthy eating in general.
- **Tailored modes of communication.** Participants stated that FDA should use a wide variety of communication methods that are tailored for various groups. For example, magazines can be used for professional organizations; train-the-trainer workshops and webinars can be used for nutrition educators; and social media and television can be used for consumers. To expand the reach of the nutrition education campaign, FDA should consider social media influencers, such as bloggers and Registered Dietitians with video streaming platforms.
- **Meet people where they are:** Participants stated that FDA's education efforts should focus on places where individuals are making food and beverage decisions (points-of-purchase), contemplating change, or planning meals. Points-of-purchase include grocery stores, corner stores, and online. FDA should also work with communities to understand how to make the biggest impact for different populations.

Breakout Session 3: Modernizing Standards of Identity/Ingredient Lists on Labels

Ingredient Lists

- **Improve readability through formatting.** Participants stated that ingredient lists are difficult to read, particularly for those with vision issues. There are several ways to help improve readability through formatting changes to the ingredient list, including: possibly using bullets and avoiding all capital letters, dense formatting, low contrast, and hard to read fonts. FDA should consider standardizing ingredient lists' format through guidance to make it consistent across products.

- **Improve consumer understanding of ingredients.** Participants stated that it is important that the ingredient list is written at an appropriate reading level for all consumers to understand it. Many consumers do not know the chemical names of vitamins. Therefore, FDA should allow food manufacturers to use the vitamin's letter name (e.g., vitamin A, vitamin C) on the label instead of the chemical name. Additionally, FDA should work with the U.S. Department of Agriculture to establish how ingredients are labeled to improve consistency. To further improve consumer understanding of the ingredients in food products, FDA should consider requiring products to list the percent by weight for each ingredient (e.g., x% whole wheat flour).

Standards of Identity

- **Should standards of identity be used to encourage the production of more healthful foods?** Participants stated that under the FD&C Act, the agency may establish food standards, including standards of identity, in order to promote honesty and fair dealing in the interest of consumers. The agency's authority to establish food standards was intended to prevent economic adulteration and maintain the integrity of food. In some cases, food standards have also maintained the nutritional integrity of food products. FDA should consider consumer demand for healthful and nutritious food products and how the standards of identity maintain and could be used to improve the healthfulness and nutrition of standardized foods.
- **Standards of identity need to be consumer driven.** Participants stated that FDA needs to evaluate consumers' perception and understanding of foods to ensure that the requirements established in the standards of identity reflect consumer expectations about the foods. This type of consumer research can help inform how standards of identity should be modernized.
- **Modernize standards of identity through horizontal changes.** Participants stated that FDA should consider horizontal changes to standards of identity to allow for more innovation and reformulation. For example, some standards of identity have rigid flavor and ingredient requirements. FDA should consider increased flexibility to allow for the use of safe and suitable ingredients to meet consumers' demands for healthier products and taste preferences. Specifically, some standards of identity establish sodium and sugar minimums that prevent manufacturers from creating low-sodium and low-sugar food options. As FDA considers modernizing standards of identity, the agency should also consider technological changes that allow for more efficient processing methods that may not fall within current standards of identity. The food market's shift to a more online and global stage should also be taken into consideration in modernizing standards of identity.