



## Toward More Comprehensive Food Labeling

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The Food and Drug Administration (FDA) is proposing to revise the Nutrition Facts label that must appear on virtually all packaged foods in the United States. The agency's proposals are strong,

urgently needed, and likely to make an important contribution to consumer behavior. But I believe they don't go far enough — additional labeling requirements can do more to influence food choices, reduce obesity, and promote health.

More than two decades ago, during my tenure as FDA commissioner, our team had the opportunity to design the now-iconic Nutrition Facts label, which was mandated by Congress in the Nutrition Labeling and Education Act of 1990.<sup>1</sup> The law gave the FDA the authority to require food manufacturers to list the amounts of fat, cholesterol, sodium, carbohydrate, and protein contained in their products and to place those amounts in the context of a typical daily diet (by

means of the “% Daily Value”), on the basis of realistic serving sizes. The agency was also required to develop standards for health claims such as “lite” and “low sodium.”

We understood then that reducing the incidence of diet-related disease and associated mortality was one of the most significant contributions we could make to public health. Our goal was not to dictate behavior, but to give people accurate, easy-to-read information that encouraged them to make healthier food choices.

Nothing in the legislation specified what the label should look like, but we knew that it had to employ the science of graphic design to nudge behavior. In the lingo of marketers, it had to “pop.” That was not an easy

task, considering that we needed to present standardized information on many thousands of products, from candy bars to cereal boxes to frozen dinners. And we had to reach busy shoppers facing aisles and aisles of choice (a grocery store carries, on average, almost 43,000 items, according to the Food Marketing Institute<sup>2</sup>).

We eventually developed a label of such clarity that it won the Presidential Award for Design Excellence in 1997. The design is specified in great detail, from typeface and size to color (often stark black and white) to the width of the lines used to separate information. A majority of consumers have said that they use the label when they shop.<sup>3</sup>

The FDA's proposed updates to the Nutrition Facts label represent the first significant revision since its launch and provide a critical opportunity to influence the course of the obesity epidemic.<sup>4</sup> Over the past decade, we have learned a great deal about

<b>Nutrition Facts</b>	
<b>8 servings per container</b>	
Serving size	2/3 cup (55g)
<b>Amount per 2/3 cup</b>	
<b>Calories</b>	<b>230</b>
% DV*	
<b>12%</b>	<b>Total Fat</b> 8g
<b>5%</b>	<b>Saturated Fat</b> 1g
	<i>Trans Fat</i> 0g
<b>0%</b>	<b>Cholesterol</b> 0mg
<b>7%</b>	<b>Sodium</b> 160mg
<b>12%</b>	<b>Total Carbs</b> 37g
<b>14%</b>	<b>Dietary Fiber</b> 4g
	<b>Sugars</b> 1g
	<b>Added Sugars</b> 0g
	<b>Protein</b> 3g
<b>10%</b>	<b>Vitamin D</b> 2mcg
<b>20%</b>	<b>Calcium</b> 260mg
<b>45%</b>	<b>Iron</b> 8mg
<b>5%</b>	<b>Potassium</b> 235mg
* Footnote on Daily Values (DV) and calories reference to be inserted here.	

**Figure 1. The FDA's Proposed New Nutrition Facts Label.**

the reinforcing properties of sugar and how they promote overeating, and we know that people tend to consume calorie-rich, sugary products at the expense of nutrient-dense foods. The Department of Agriculture's Dietary Guidelines urge Americans to limit their consumption of "added sugar" — sugar that is added to foods during processing or preparation rather than being intrinsic to it (as it is in fruit).

To support that recommendation, the FDA's proposal would require manufacturers to indicate how much sugar they add to a food, distinguishing it from the total sugar that is present. It would also revise serving sizes so that calorie counts and nutrient levels more accurately reflect what people actually eat, and it would feature that information much more prominently (see Fig. 1). The goal is to grab the consumer's attention enough to influence behavior.

An omission in the current proposals is a Daily Value for added sugar, which would let consumers quickly see whether a food is low or high in added sugars. But in general, the FDA is taking some very important, science-based steps.

What the proposals don't do is consider a product's overall nutritional value. There is nothing in the new framework that actively encourages consumers to purchase food rich in the fruits, vegetables, and whole grains that are rightfully considered "real food." Instead, the focus is on specific nutrients — an emphasis that gives food companies an incentive to fortify their products so they can make claims such as "added fiber" or to produce sugar-laden foods that can be labeled "low fat."

Beyond refreshing the Nutrition Facts label, I believe that the FDA needs a larger strategy to influence the food environment and to support the admonishment based on the Dietary Guidelines to "make half your plate fruits and vegetables."

Overhauling the ingredient list, which manufacturers are obligated to provide in descending order by weight, certainly belongs on the agenda. Tiny type, complex names, and confusing formats make many ingredient lists almost impossible to read or understand. Incorporating smart design into those lists is a common-sense requirement.

In addition, product manufacturers should have to aggregate related ingredients. At present, they can list different sweeteners separately — pushing ingredients such as fructose, corn syrup, dextrose, sucralose, brown rice syrup, and maltodextrin to lower positions on the list. If we instead defined all forms of sugar

as a single ingredient, sugar might emerge near the top of many products' lists.

We also need front-of-package labeling that we can trust. Historically, the industry has claimed the front for promoting its products, and the FDA has accepted that convention, with regulated labeling confined to the side or back of a package. But there is no reason that acceptance should stand. Indeed, the Institute of Medicine and the FDA have worked together in the past to develop some tough front-of-package proposals, but these efforts stalled after a self-protective industry offered a paler voluntary labeling strategy known as Facts Up Front.<sup>5</sup>

A stronger approach would require that the top three ingredients, the calorie count, and the number of additional ingredients be listed on the front of every package in bold, easy-to-read type (see Fig. 2). To the harried shopper hoping to make some healthy choices, it would offer a quick way of identifying high-calorie, obesity-inducing food and of finding healthier alternatives. Because the number of ingredients in a product often reflects the substitution of chemical additives for the flavor of real food, labels reading "+5 more ingredients" or "+20 more ingredients" would be informative shorthand.

Far from being fully fleshed-out proposals, the ideas sketched here are only a starting place for the complex process that I hope will move the FDA from an initial proposal through public commenting and into regulations. Whatever form those regulations ultimately take, their goal should be to encourage the sale and consumption of products full of fruits, vegetables, and whole grains, rather than those loaded

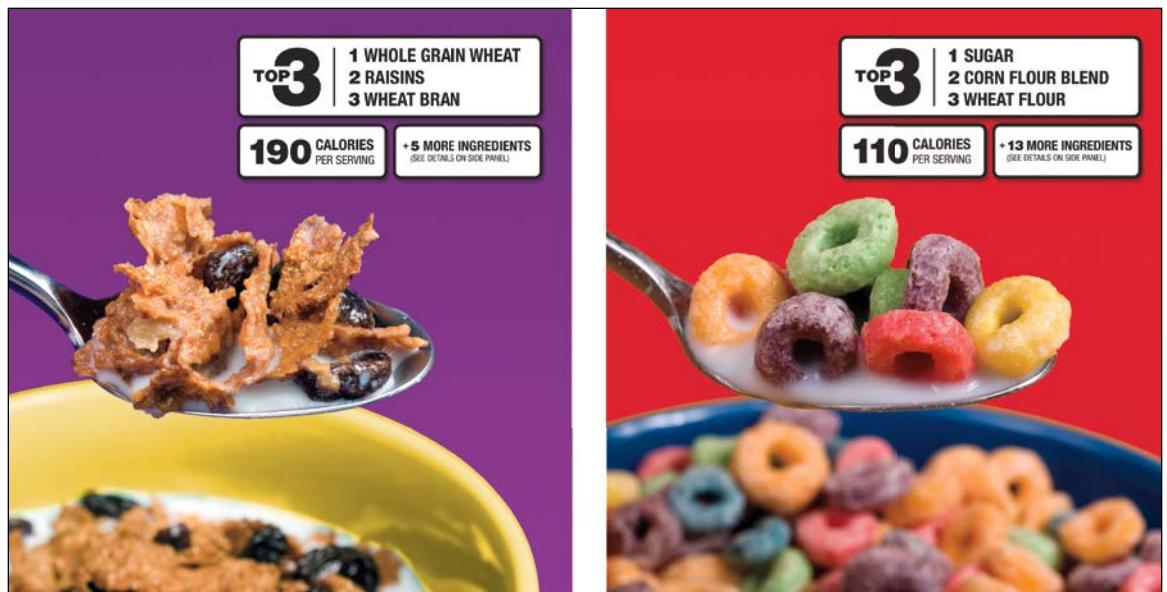


Figure 2. Possible New Front-of-Package Labeling.

with little more than fat, sugar, and salt.

That won't be easy. The food industry is expert at promoting its food in a captivating manner, so the FDA has very heavy competition for the consumer's eye. But we are riding a tide of change, with obesity experts increasingly recognizing the value of healthy eating and consumers eager to make smarter food choices. A revised Nutrition Facts label combined with a streamlined, comprehensible ingredient list and trustworthy front-of-package labeling can have a

powerful impact not only on consumer behavior, but perhaps more important, on the decisions manufacturers make about the foods they create for the marketplace.

Disclosure forms provided by the author are available with the full text of this article at NEJM.org.

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## Nutrient-Content Claims — Guidance or Cause for Confusion?

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Nutrient-content claims, such as "sugar-free," "high in oat bran," or "contains 100 calories" — any "claims on a food product that directly or by implication characterize the level of a nutrient in the food" — are reg-

ulated in accordance with specific requirements of the Food and Drug Administration (FDA). According to the 2000–2001 Food Label and Package Survey (FLAPS), half of all packaged foods and beverages sold in the

United States presented such nutrient-content claims.<sup>1</sup> The prevalence of these claims has increased in recent years,<sup>2</sup> as the food and beverage industry has launched myriad new products to offer palatable, lower-calorie