



November 22, 2023

To whom it may concern:

Below is a transcript of the oral comments provided by senior policy scientist Eva Greenthal on behalf of the Center for Science in the Public Interest at the Front-of-Package Nutrition Labeling Virtual Public Meeting on November 16, followed by a list of the dozens of public health and consumer organizations that have expressed support for FDA's development of a mandatory front-of-package nutrition label. Thank you for the opportunity to share this information.

Transcript

In August 2022, CSPI filed a [citizen petition](#) calling on FDA to adopt a front-of-package labeling system that is mandatory; interpretive with respect to levels of added sugars, sodium, and saturated fat; and includes calories.

We are thrilled at the recent progress FDA has made towards designing and studying front-of-package icons. I want to highlight two important considerations for FDA as it moves forward.

First, it is critically important that FDA's front-of-package labeling policy be mandatory, not voluntary. The U.S. is several years behind other nations, so we can learn from their experiences, and the data clearly show that mandatory policies are preferable. A 2023 [research report](#) from the George Institute for Global Health found that in Australia, nine years after the government endorsed the voluntary front-of-pack Health Star Rating system, Health Star icons appeared on only 36% of products that could be expected to bear the labels. The report found that large multi-national companies, like Coca-Cola, Mars, Nestle, Unilever, and Mondelez, are failing to consistently apply the labels. And healthier product categories like nuts and salads were more likely to bear the icons than less healthy categories like condiments and confectionery, showing that when labeling is voluntary, companies will use it for marketing purposes rather than public health promotion. Mandatory labeling will optimize impact and ensure consistency across the food supply.

Second, it is important that FDA require front-of-pack calorie disclosures alongside FDA's mandatory front-of-pack nutrition label. This is one of the few areas where leading food industry stakeholders (like Consumer Brands Association) and consumer nutrition advocates are aligned. While [FDA surveys](#) show calories are the most viewed component of the Nutrition Facts label, [IFIC's 2022 Food & Health Survey](#) found that only 29% of consumers looked at calories on the Nutrition Facts label while grocery shopping. Requiring calorie icons like those already used on some products as part of Facts Up Front will streamline front-of-pack labeling rules with existing rules for chain restaurants and vending machines. We urge FDA to include calories in its proposed rule.

Thank you.

Organizations Supporting FDA's Development of a Mandatory Front-of-Package Nutrition Label

Each of the organizations below have expressed support for FDA's development of a mandatory front-of-package nutrition label in at least one of the following ways:

- Provided supportive oral testimony at the public meeting on 11/16/23
- Submitted a [petition](#) to FDA in 2022 or signed a [letter of support](#) for the petition
- Signed a [letter of support](#) for the TRUTH in Labeling Act
- Signed supportive [comments](#) responding to FDA's research proposal

1. Advocates for Children's Diets
2. American Cancer Society Cancer Action Network
3. American Heart Association
4. American Institute for Cancer Research
5. American Public Health Association
6. Association of SNAP Nutrition Education Administrators
7. Association of State Public Health Nutritionists
8. B.Komplete
9. Balanced
10. Center for Science in the Public Interest
11. ChangeLab Solutions
12. Community Food Advocates
13. Consumer Federation of America
14. Consumer Reports
15. Corporate Accountability
16. Food & Water Watch
17. Global Health Advocacy Institute
18. Healthy Food America
19. Interfaith Center on Corporate Responsibility
20. Interfaith Public Health Network
21. International Fresh Produce Association
22. Laurie M. Tisch Center for Food, Education & Policy at Teachers College, Columbia University
23. National Association of Chronic Disease Directors
24. National Association of Pediatric Nurse Practitioners
25. National Association of School Nurses
26. National Center for Health Research
27. National WIC Association
28. Prevention Institute
29. Public Health Advocacy Institute
30. Redstone Global Center for Prevention and Wellness at George Washington University
31. Rudd Center for Food Policy and Health at University of Connecticut
32. Society for Behavioral Medicine
33. Society for Nutrition Education and Behavior
34. Trust for America's Health
35. Unidos US