August 1, 2014

Division of Dockets Management (HFA-305)
Food and Drug Administration
5360 Fishers Lane
Rm. 1061
Rockville, MD 20852

RE: Docket FDA-2012-N-1210 RIN 0910-AF22

Dear Madam or Sir,

The International Food Information Council (IFIC) Foundation appreciates the opportunity to submit comments on the proposed revisions to the Nutrition Facts Panel (NFP). The IFIC Foundation is a nonprofit organization with a mission to effectively communicate science-based information about health, nutrition, and food safety for the public good.

One of the objectives at the Foundation is understanding public perceptions by conducting consumer research. It is the belief of the Foundation that consumer research is a critical first step in determining Americans’ understanding of nutrition information and examining how consumer knowledge, perceptions and attitudes may impact behavior—particularly in this case where the proposed NFP revisions include new information and visual design elements.

We are excited to be sharing preliminary findings from our most recent research project. Please see our attached written comments and preliminary data. We believe they will be of keen interest to the agency.

Sincerely,

David B. Schmidt
President & CEO
International Food Information Council Foundation

Marianne Smith Edge, MS, RD
Senior Vice President, Nutrition & Food Safety
International Food Information Council Foundation
August 1, 2014

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The Foundation has previously conducted consumer research specific to the Nutrition Facts Panel (NFP). In 2006-2008, the IFIC Foundation Food Label Consumer Research Project observed and interpreted how consumers use the NFP and what changes to the NFP, if any, would enhance consumers’ ability to build healthful diets.

The Food Label Consumer Research was a three-phase project entailing qualitative and quantitative phases. The overall project objectives were to:

1. Understand how consumers make food and beverage purchasing decisions using the NFP in the context of the entire package as well as other food and nutrition information sources (Phase I - ethnographic interviews);
2. Explore changes to the NFP that could facilitate consumers’ decisions (Phase II - iterative focus groups); and
3. Measure to what extent specific NFP changes or enhancements, compared to the current NFP, help consumers interpret NFP information (Phase III - quantitative Web experiment and survey).

Based on the overall findings from our three-phase research project, the Foundation learned that consumers generally have a positive perception of the food label, but also found that there are several ways the label could potentially be enhanced to help people understand the information provided and use it even more effectively:
• Mentioning a government body, like the FDA, in a highly used area of the NFP, such as a header in the main body of the NFP, increases consumer trust in the information provided, particularly serving size;
• Moving the location of calories into the main body of the NFP appears to encourage greater use of this information;
• Adding the percent Daily Value (%DV) of calories helps consumers consider a product’s calorie contribution within the context of their daily diet; and
• Moving the information in the current footnote into an easily referenced column in the main body of the NFP greatly increases consumers’ ability to evaluate a product.

These research findings highlight the critical need for conducting additional consumer research to determine if the benefits of certain enhancements to the NFP outweigh any confusion they may generate. Also, any changes must be accompanied by appropriate consumer education to ensure that people know how to use the information provided.

The Foundation shared these insights with FDA in 2009, and we are pleased to see that our findings were referenced in the recently proposed NFP revisions.

In the Federal Register published on Monday, March 3, 2014, FDA stated an intent to address “how a declaration of ‘Added Sugars’ and alternative footnote statement may influence consumer use of the label.” The agency also stated that they “are interested in receiving, as part of any comment, other available research data and other factual information relevant to this issue, including the proposed double indented placement of added sugars below total sugars.”

With a continued commitment to providing high-quality and relevant consumer research, the Foundation has recently completed a two-phase (qualitative and quantitative) research project on how consumers use and understand the NFP and how an added sugars declaration may be perceived among consumers. We are excited to be sharing our preliminary findings within these written comments and believe they will be of keen interest to the agency to further “understanding of whether modifications to the Nutrition Facts label format could help consumers make more informed choices, based on their perceptions of the nutritional attributes and overall healthfulness of a food product.”

Our preliminary report demonstrates the need for FDA to more broadly consider the implications of our research as the agency reconsider its tentative conclusions about added sugars. We understand that FDA is currently conducting their own study, “FDA Experimental Study on Consumer Responses to Nutrition Facts Labels with Various Footnote Formats and Declaration of Amount of Added Sugars,” on this topic. In addition to reviewing the Foundation’s consumer research results, we recommend that FDA re-open the comment period at a later date to consider all consumer research, including its own study.
Consumer Research Designs: IFIC Foundation’s compared to FDA’s

The Foundation’s research (a national online survey among adult consumers) followed a different design than that of FDA. Our sample (n = 1,088) was balanced to the U.S. census profile on census region, gender, age, race and Hispanic national origin. Our sample was split into three test cells with each cell balanced based on the U.S. Census profile.

As you review our findings below, please note the key differences and similarities (based on FDA information available online here) that we’ve observed between the Foundation’s consumer research design and the ongoing FDA study.

Key Differences

1. The Foundation’s consumer research tested perception and comprehension of nutrition information in the proposed NFP format. The FDA consumer research will use the current NFP format.
2. The Foundation’s consumer research tested NFP formats with and without a declaration for “Added Sugars.” The FDA consumer research will test “Nutrition Profiles for Experimental Conditions Related to Added Sugars” in NFP versions that only have a declaration for “Added Sugars.”
   a. The Foundation tested three different NFP versions (all in the proposed format) which are listed below:
      i. NFP (S) showing only a "Sugars" line (n = 352)
      ii. NFP (S+A) showing a "Sugars" line with a declaration for "Added Sugars" (n = 356)
      iii. NFP (TS+A) showing a "Total Sugars" line with a declaration for "Added Sugars" (n = 380)
   b. Participants in each test cell saw and evaluated one of the NFP versions in first position prior to being exposed to the other two options.
      i. Within each cell, we rotated NFPs for three different products, so a similar number of consumers in each cell were exposed to the panels sequence for:
         1. Cereal (n = 364)
         2. Yogurt (n = 367)
         3. Frozen Meal (n = 357)
c. This key difference gives the Foundation’s research the ability to examine differences in label comprehension between NFP versions with and without an "Added Sugars" declaration.

3. The Foundation’s research offered consumers the opportunity to respond to open-ended questions in their own words to key questions about:
   a. Perception of what they think Added Sugars are;
   b. What the Added Sugars line means to them;
   c. How sugars in the Added Sugars line might be different from other sugars;
   d. How they determined the total amount of sugars in a product from the information presented to them on the NFP.

**Key Similarities**

1. The Foundation’s consumer research showed NFPs (to consumers) that contained the identical product nutrition profiles that the FDA research will utilize.
   a. The corresponding FDA labels that the Foundation research tested were Cereal 3, Yogurt 3 and Frozen Meal 2.
2. The Foundation’s and FDA’s consumer research both ask consumers to identify the total amount of sugars perceived to be in a product based on the NFP presented.
3. The Foundation’s research asked many of the same questions that FDA will pose to consumers.

**IFIC Foundation Phase 1—Design and Key Qualitative Findings**

In the Federal Register published on Monday, March 3, 2014, FDA stated, “Policy makers and educators can use focus groups findings to test and refine their ideas, but should then conduct further research before making important decisions such as adopting new policies and allocating or redirecting significant resources to support these policies.”

Before conducting a quantitative survey, the Foundation explored consumer understanding through qualitative research by individually interviewing (30 minutes each) a total of 27 Americans in three different markets across the country (Los Angeles, Baltimore and Atlanta). We chose individual interviews (as opposed to groups) to assess perception, understanding and personal use of nutrition information and labels in a more intimate way—something that focus groups may not always provide when group dynamics are involved. The purpose of this phase was to inform the construction of our quantitative survey with the intention of validating our qualitative findings.
During our qualitative phase, we presented consumers with a variety of current and proposed label versions and formats. In addition to the bolded calorie information, consumers took notice of the new “Added Sugars” line. In our sample, consumers were challenged with perceptions and interpretations associated with the term “Added Sugars.”

Given the increased attention to sugars, it’s not surprising that the term “Added sugars” connotes a less desirable or less healthful product in the minds of some consumers. What was illuminating, however, was the varying degree of consumer perceptions of what constitutes added sugars.

- Some believe added sugars to be plain table sugar.
- Some believe that added sugars are extra sugars that have been newly introduced to alter the composition of an original product.
- Others believe added sugars could even encompass low-calorie sweeteners.

Along with general misunderstanding of the term “Added sugars,” our sample also struggled in identifying absolute amounts of sugars in products from the NFPs presented. These challenges observed in the qualitative phase were examined in more depth during the quantitative phase and are reported on below.

**IFIC Foundation Phase 2—Key Quantitative Findings**

**NFP comprehension of total sugars content significantly varies between NFP versions with and without added sugars information**

The proposed FDA rule states, “Considering current science and recommendations related to added sugars, we are also proposing to require the declaration of “added sugars,” that will provide consumers with information they need to implement the dietary recommendations of the Dietary Guidelines for Americans, 2010 (2010 DGA).”

The IFIC Foundation supports providing information to consumers that informs their ability to make healthful diet and lifestyle choices. The Foundation also understands and supports the need for increased adherence to the Dietary Guidelines for Americans.

A key question to answer in our consumer research was whether or not an “Added Sugars” declaration on the NFP provides clear information that is well understood by consumers and will be used appropriately in efforts to make informed dietary choices.
The ability for consumers to accurately identify the total amount of sugars in a product is significantly higher when an “Added Sugars” line is not presented on the NFP.

Our initial results illustrate significant differences in comprehension between NFP versions with and without an “Added Sugars” declaration. Accurate determination of total sugars content in a product was:

- Highest (92%) when shown an NFP with only a “Sugars” line (S).
  - *This was significant versus the other two NFP versions (S+A and TS+A).
- Lowest (55%) when shown an NFP with a “Sugars” line and an “Added Sugars” line (S+A).
- 66% when shown an NFP version with a “Total Sugars” line and an “Added Sugars” line (TS+A).
  - *This was significant versus the S+A version.

Consumer understanding that the sugars in an “Added Sugars” line would be included in a “Sugars” line or “Total Sugars” line was significantly higher on NFPs with a “Total Sugars” line.

The agency has stated that they “are considering using the term ‘total sugars’ in lieu of ‘sugars’ on the Nutrition Facts label if ‘added sugar’ declaration is finalized, as proposed. FDA plans to conduct consumer testing of the terms ‘total sugars’ and ‘sugars’ on the Nutrition Facts label (FR 2013–12824) to determine if use of the term ‘total sugars’ aids consumers in understanding that added sugars are part of the total amount of sugars in product.”

To confirm how consumers interpret an “Added Sugars” declaration when determining the total amount of sugars in a product, we asked directly if the sugars in the “Added Sugars” line were added to or included in the “Sugars” line or “Total Sugars” line for those two NFP versions (S+A and TS+A). These answers are consistent with the correct determination of total sugars content:

- Over half (52%) believe that the amount in the “Added Sugars” line is added to the amount in the “Sugars” line. *This was significant versus the TS+A NFP version.
  - 37% believe the amount in the “Added Sugars” line is included in the amount in the “Sugars” line.
- One third (33%) believe that the amount in the “Added Sugars” line is added to the amount in the “Total Sugars” line.
  - Over half (52%) believe the amount in the “Added Sugars” line is included in the amount in the “Total Sugars” line. *This was significant versus the S+A version.

Most consumers perceive that products with an “Added Sugars” declaration have a higher sugars content than is actually present. This misperception affects purchasing behavior.

Given our observations during the qualitative phase, these quantitative results are not surprising. The perception of sugars content in a product is a critical factor in consumer purchasing behavior. When we showed consumers three NFP versions (S, S+A and TS+A) of a product (cereal, yogurt or frozen meal) with each NFP having identical nutritional profiles and asked them which NFP version they would purchase first, more than 3 in 4 (76%) chose the S version.
As a follow up question, we asked “if you wanted to buy the product that has the least amount of sugars based on this label, which one would you select?” Consistently, the NFP version with only a “Sugars” line (S) was the product identified as having the least amount of sugars.

- Over half (52%) think the NFP version with only a “Sugars” line (S) has the least amount of total sugars.
- About one-third (34%) see all three NFP versions as having the same amount of sugars.

There is confusion among consumers regarding what added sugars are.

Both phases of our research revealed consumers lack understanding about what is considered to be an added sugar. This is a key concept consumers would need to comprehend to determine what the “Added Sugars” declaration means in terms of a product’s composition and nutrition profile. Despite this confusion, consumers believe the mere presence of an “Added Sugars” line suggests a differentiation between those types of sugars and the types included in the “Sugars” or “Total Sugars” line. One survey participant stated:

“I assume they must be different from regular sugars used in the manufacturing. Since it must be required on the label to differentiate between them, I assume they are artificial type sugars.”

In fact, more than half of consumers (56.3%) believe sugars in the “Added Sugars” line differ from those in the “Sugars” or “Total Sugars” line, while one in five (20.0%) do not know. Those who believe “Added Sugars” are different from “Sugars” think they are just that – added beyond the natural ingredients in the product (31%), not natural (15%), or different kinds of sugars added for some purpose (7%).

While many consumers believe added sugars are in some way different, perceptions vary widely on the definition of the types of sugars that would be in the “Added Sugars” line. In the qualitative phase, when asked to give examples of what might be an added sugar, interviewees provided many different answers, such as more of the same type of sugars inherent in the product, additional white granulated sugar, additional sweeteners, low-calorie sweeteners, and sugar alcohols. In the quantitative phase, survey participants were given an open-ended response to describe what “Added Sugars” means. Similarly, a wide array of responses were provided, but one in five simply did not know how to describe added sugars:
Survey participants were also given a list of various sweeteners and asked which would be included in the “Added Sugars” line in the NFP. As noted previously, some consumers incorrectly offered low-calorie sweeteners and sugar alcohols as examples of added sugars. Overall, sweeteners such as sucralose, saccharin and stevia are less likely to be considered sugars but equally likely to be considered added sugars. Approximately 7 in 10 consumers incorrectly believe low-calorie sweeteners would be included in the “Added Sugars” line or do not know.

Given these knowledge gaps identified by our research, it will be important for communications regarding the NFP and an “Added Sugars” declaration to have a consistent definition of added sugars and what ingredients would be included.

The relationship between added sugars and calories is not clearly understood by consumers.

The proposed FDA rule states, “[W]e are proposing to require the declaration of added sugars on the Nutrition Facts label to provide consumers with information that is necessary to meet the dietary recommendation to reduce caloric intake from solid fats and added sugars.” One objective of our research was to explore consumer knowledge and behavior regarding added sugars and calories and their ability to compare labels. Qualitative participants were asked to select a product based on two proposed labels which were identical except for the Calories, Total Carbohydrates, and Added Sugars section of the labels: 1) lower Calories and Total Carbohydrates and higher Added Sugars, and 2) higher Calories and Total Carbohydrates and lower Added Sugars. Most gravitated quickly to the lower Calorie / lower Carb option, even though the Added Sugars were greater. On balance, consumers did not use the information to lower their intake of added sugars as recommended, but made the decision based on the lower Calories. This finding indicates the label may already have the most relevant information (total calories) for consumers to make their food and beverage decisions.

While consumers tend to give more weight to calories and total carbs than added sugars in their food and beverage decisions, a knowledge gap was clearly observed among most consumers about the caloric contribution of added sugars compared to other types of sugars. Though a sizeable minority of consumers (42.6%) correctly believe added sugars have the same calories as other sugars, the majority of consumers do not know this. To the contrary, nearly one in four (23.6%) believe added sugars have more calories than other sugars, while another 29.9% do not know. Consumers were
even further confused when asked whether added sugars have the same amount of calories as carbs. Only 38.4% agreed, while 24.4% incorrectly believe the amount of calories in added sugars differs from carbohydrates and 37.1% do not know.

FDA also states that “neither the 2010 DGA nor the IOM macronutrient report concluded that added sugars consumption from all dietary sources, in itself, increases obesity. In fact, the 2010 DGA states that added sugars do not contribute to weight gain more than any other source of calories.” Our research shows most consumers also recognize this and do not believe added sugars differ from other sugars in terms of their effects on weight. Nearly three-fourths of consumers (74.4%) agree added sugars contribute to weight gain and obesity the same as other types of sugars.

With the increasing prominence of calories on the proposed label, it will be important for consumers to understand the relationship between the carbohydrates, added sugars, and calories.

**Consistent, coordinated communication efforts will be needed to educate consumers about the NFP and added sugars.**

According to the proposed rule, FDA “acknowledge[s] that, if finalized, a requirement for declaration of sugars on the Nutrition Facts label will need to be accompanied by consumer education on the role of added sugars, along with solid fats, and the use of the new information on the label in overall dietary planning.” It is evident from IFIC Foundation research that substantial knowledge gaps about added sugars currently exist among consumers.

- There is confusion over what added sugars are, what ingredients would be considered added sugars, and how they differ from other types of sugars.
- Over half of consumers (55.7%) either believe added sugars would be in addition to the amount shown in the sugars or total sugars line or do not know.
- Over half of consumers (57.4%) do not understand that added sugars contribute the same amount of calories as other types of sugars.
- Less than 1 in 3 consumers (32.4%) understand sugars are carbohydrates.

It is critical to address these knowledge gaps in order for consumers to correctly interpret and use the “Sugars” declaration to make informed dietary choices. One survey participant noted, “Labels should inform, and not confuse the consumer.” The “Added Sugars” declaration clearly invokes confusion, and when combined with the fact that FDA has stated that they “continue to recognize the lack of a physiological distinction between added and naturally occurring sugars,” this aspect of the proposal has a high risk of misinforming and misleading consumers as to the total amount of sugars in a food product. In order to inform and not confuse, consistent, science-based information from FDA and other stakeholders in the food and nutrition environment will be necessary to ensure the proposed NFP updates are clear and comprehensible to consumers. FDA is correct that an investment in education is essential; however, these results suggest it would be more productive to invest educational resources in a better understanding of total sugars rather than to combat any misleading understanding or confusion due to a declaration of “Added Sugars.”
Conclusion/Summary of Key Points

In summary, consumer understanding of added sugars in Nutrition Facts is limited, and additional consumer research is essential to determine a format to provide this type of information in a manner that is not misleading or confusing, but informative. We ask the FDA to consider the following key findings in context of the public health impact of the proposed “Added Sugars” declaration to the NFP:

- The varied and conflicting interpretation of NFP information that we’ve encountered is a great reminder of the critical role that consumer research and testing must play prior to the implementation of proposed label changes.
- NFP comprehension of total sugars content significantly varies between NFP versions with and without added sugars information.
- The ability for consumers to accurately identify the total amount of sugars in a product is significantly higher when an “Added Sugars” line is not presented on the NFP.
- Consumer understanding that the sugars in an “Added Sugars” line would be included in a “Sugars” line or “Total Sugars” line was significantly higher on NFPS with a “Total Sugars” line.
- Most consumers perceive that products with an “Added Sugars” declaration have a higher sugars content than is actually present. This misperception affects purchasing behavior.
- There is confusion among consumers regarding what added sugars are.
- The relationship between added sugars and calories is not clearly understood by consumers.
- Consistent, coordinated communication efforts will be needed to educate consumers about the NFP and added sugars.

We are hopeful the above results from our consumer research will aid FDA in their efforts to redesign a more useful, coherent Nutrition Facts Panel.