Front-of-Package Nutrition Labeling

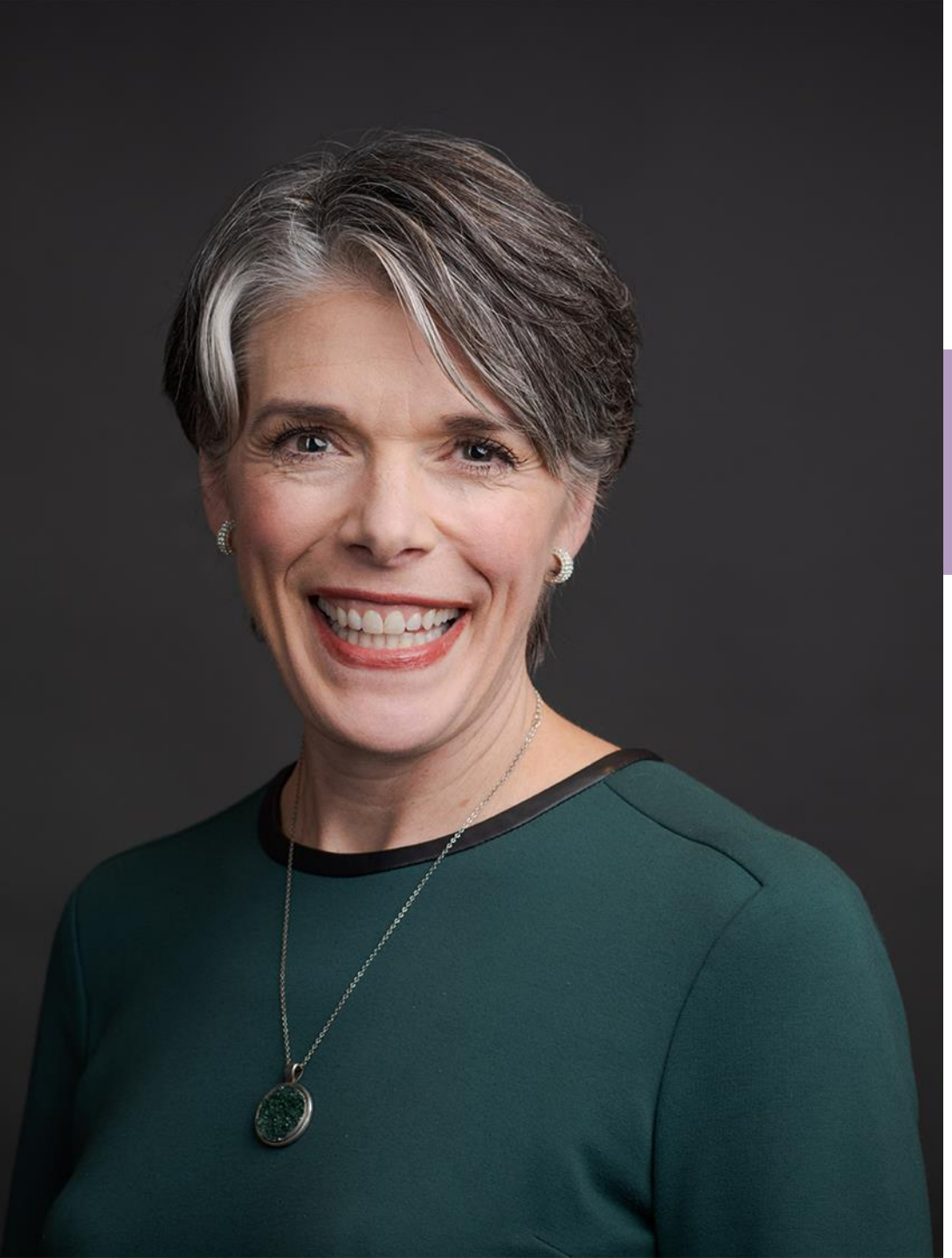
November 16, 2023

2:30-5pm (eastern)

The public meeting will begin shortly

This meeting is part of the Foundation's Nutrition Partnership project underwritten by Kellogg and Nestlé

REAGAN-UDALL FOUNDATION FOR THE FDA



REAGAN-UDALL FOUNDATION FOR THE FDA

Welcome

Susan C. Winckler, RPh, Esq.

CEO, Reagan-Udall Foundation for the FDA

Housekeeping

REAGAN-UDALL FOUNDATION FOR THE FDA

Your microphone and video will remain off during the meeting. Those who registered to present public comment will be unmuted and asked to use the 'Raise Hand' function when it is their time to speak.

This public meeting is being recorded. The video recording, slides and transcript will be posted on the Foundation website soon after the meeting at www.ReaganUdall.org.

Please share your questions and comments for the speakers using the Zoom chat function.

Agenda

REAGAN-UDALL FOUNDATION FOR THE FDA

2:30 pm	Welcome & Opening Remarks
2:40 pm	Commissioner Remarks
2:45 pm	Deputy Commissioner Remarks
2:50 pm	FDA's Front-of-Package Nutrition Labeling Initiative
3:05 pm	Why Nutrition Labeling Matters Panel Discussion
3:35 pm	Public Comment
5:00 pm	Closing Remarks & Adjournment

REAGAN-UDALL FOUNDATION FOR THE FDA

Commissioner Remarks

Robert M. Califf, MD, MACC

Commissioner of Food and Drugs

U.S. Food and Drug Administration

REAGAN-UDALL FOUNDATION FOR THE FDA

Deputy Commissioner Remarks

James "Jim" Jones, MS

Deputy Commissioner for Human Foods

U.S. Food and Drug Administration

REAGAN-UDALL FOUNDATION FOR THE FDA

FDA's Front-of-Package Nutrition Labeling Initiative

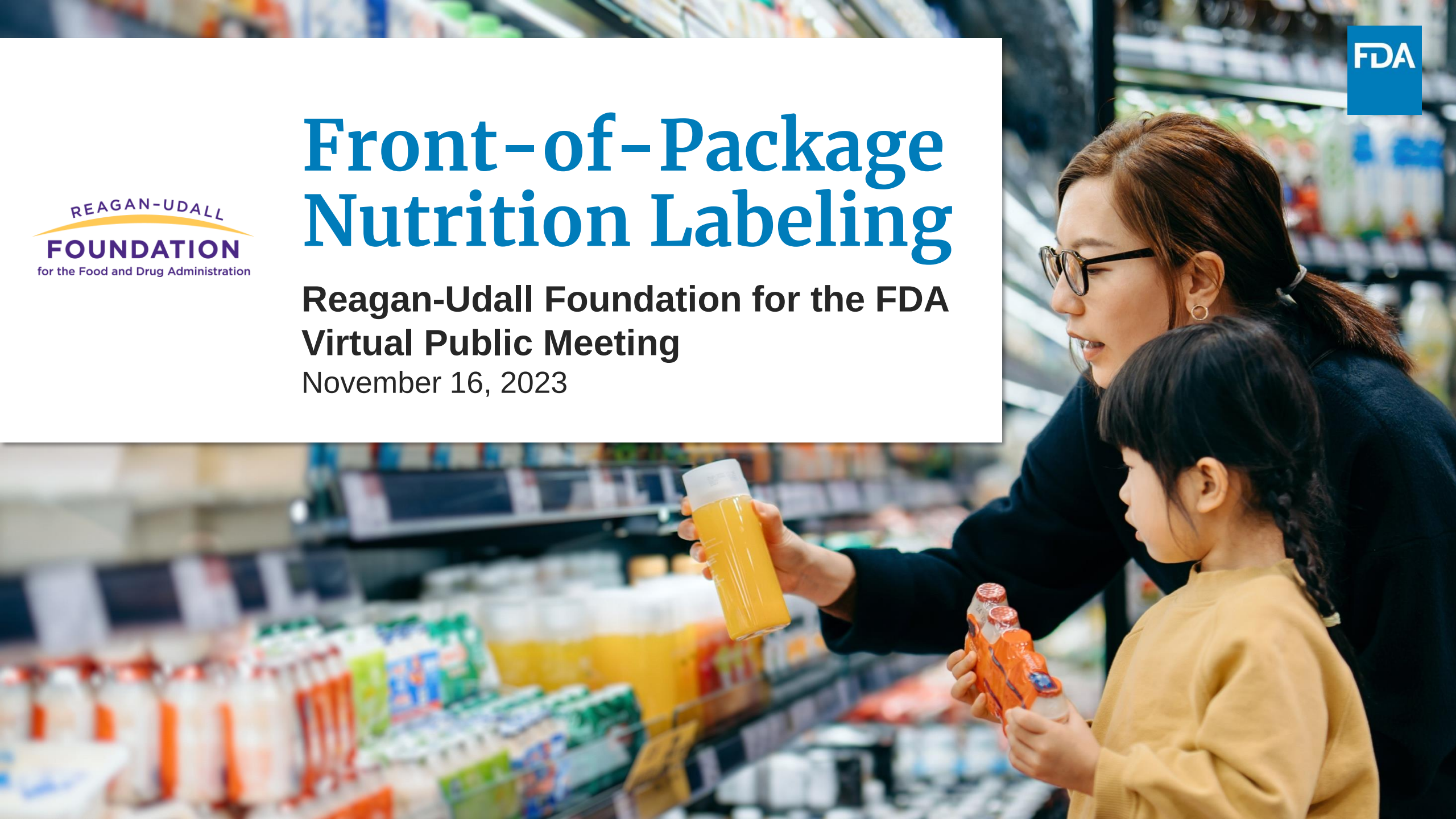
Robin McKinnon, PhD, MPA

Senior Advisor for Nutrition Policy, Center for Food Safety and Applied Nutrition

U.S. Food and Drug Administration

Front-of-Package Nutrition Labeling

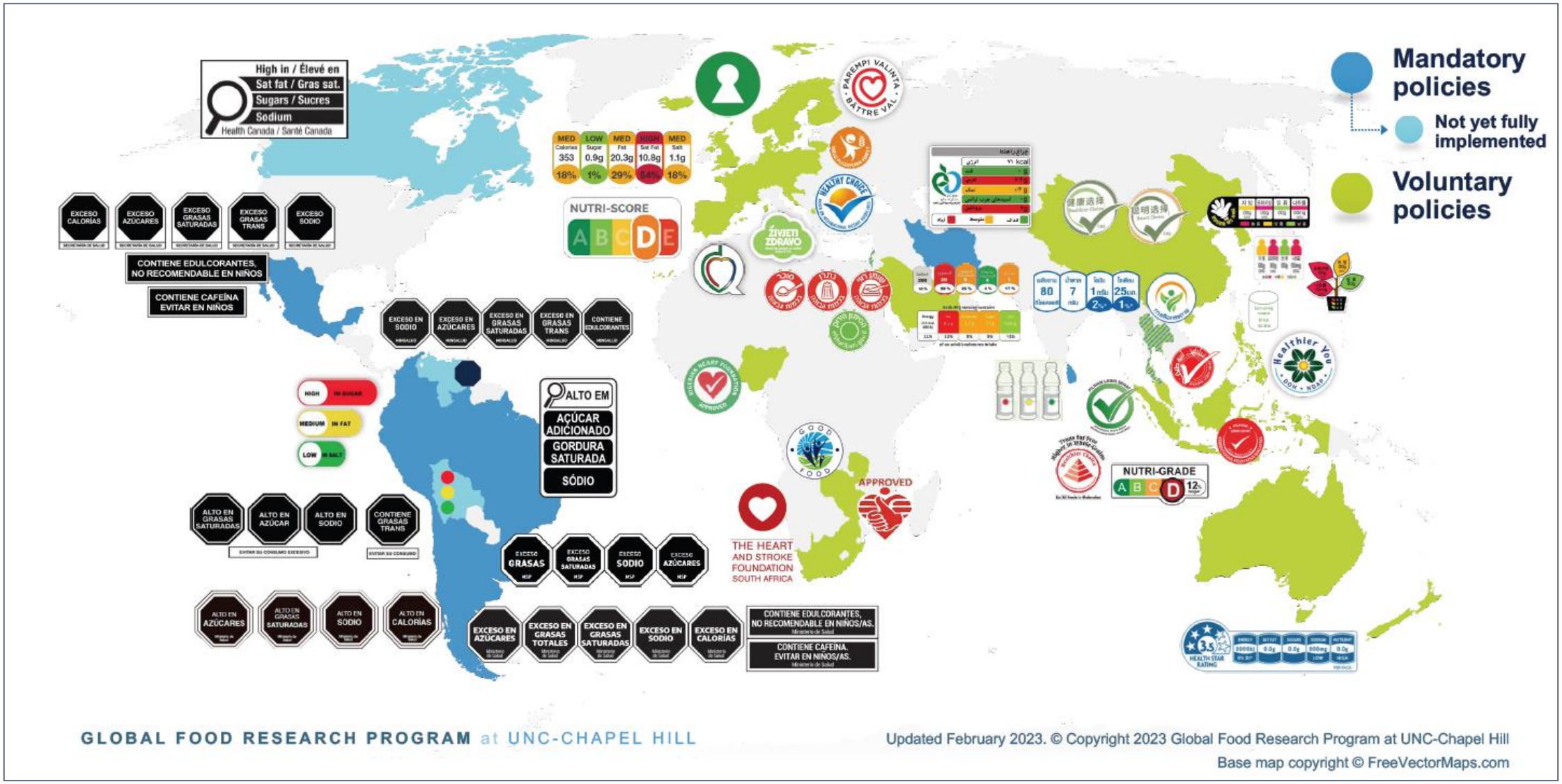
Reagan-Udall Foundation for the FDA
Virtual Public Meeting
November 16, 2023



Introduction & Background

- White House National Strategy on Hunger, Nutrition, and Health
- Wide adoption of front-of package (FOP) schemes around the world
- Institute of Medicine reports
- FDA research activities
  - Literature review
  - 2022 Focus group research
  - 2023 Experimental study
  - 2023 Focus group research
- Engagement & Next Steps

Front-of-Package Nutrition Labeling



Source: https://www.globalfoodresearchprogram.org/wp-content/uploads/2023/02/GFRP-UNC_FOPL_maps_2023_02.pdf

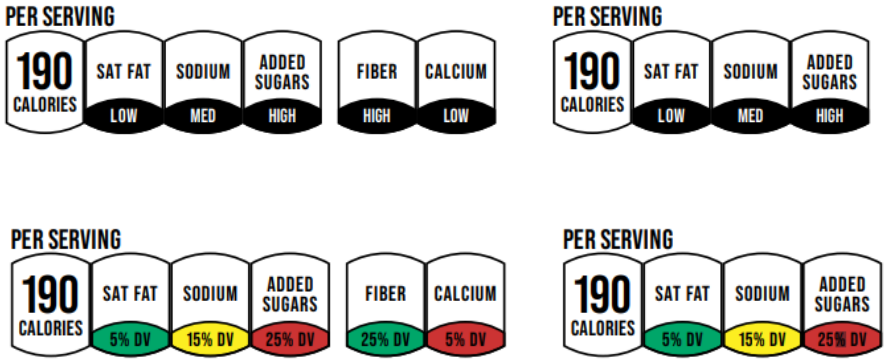
Front-of-Package Nutrition Labeling

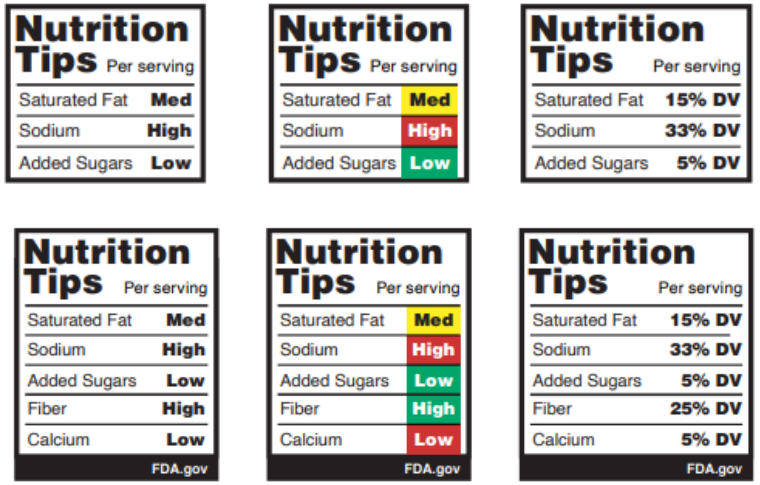
FDA Research Activities

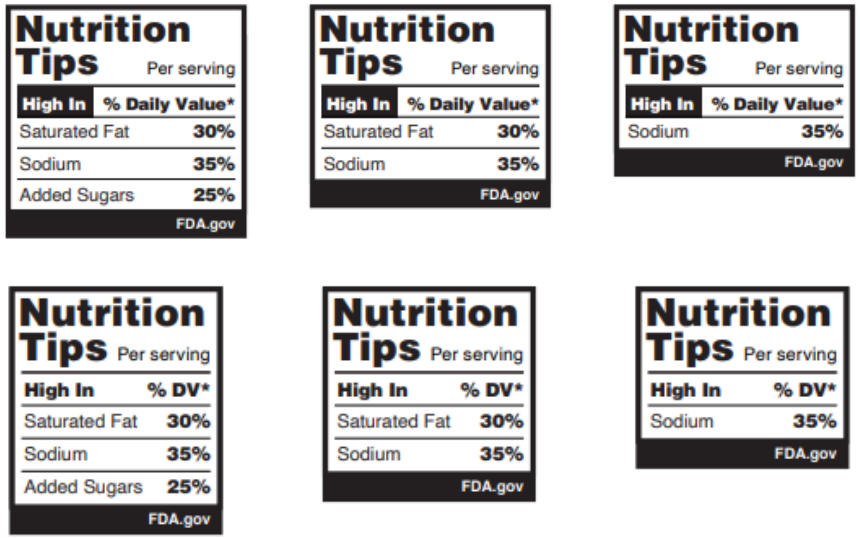
- Literature review
- 2022 Focus group research
- 2023 Experimental study
- 2023 Focus group research

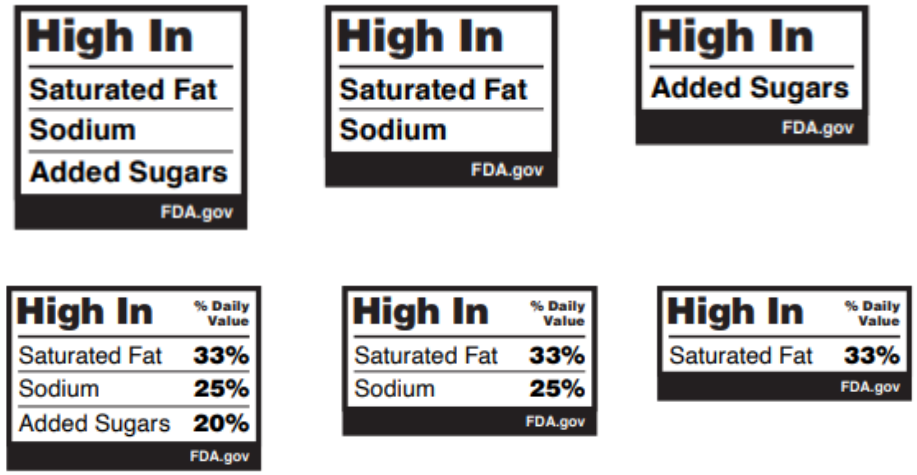
https://www.fda.gov/food/food-labeling-nutrition/front-package-nutrition-labeling

2022 Focus Group Research: Selected Schemes









Themes From 2022 Focus Groups

- Mixed findings on how much information participants preferred to be provided in FOP schemes.
- Strong finding that participants believed that the products bearing schemes reflecting “High-In” were not healthy
- Participants were confused by the use of red, yellow, and green when schemes contained both nutrients to limit and nutrients to get enough of; for example, participants could not easily reconcile using red to convey high sodium and red to convey low fiber
- Mixed reactions to the inclusion of FDA.gov on the schemes

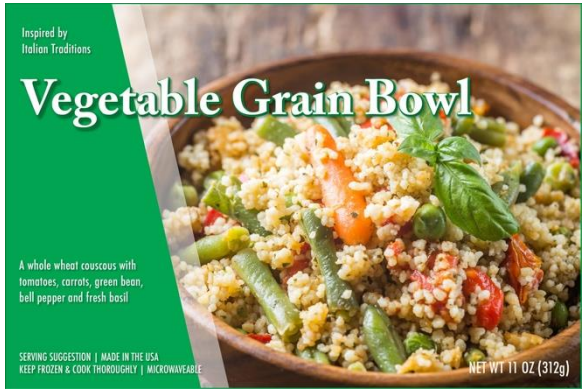
2023 Experimental Study

Purpose

- Assess participants' ability to use schemes to evaluate the healthfulness of a food product

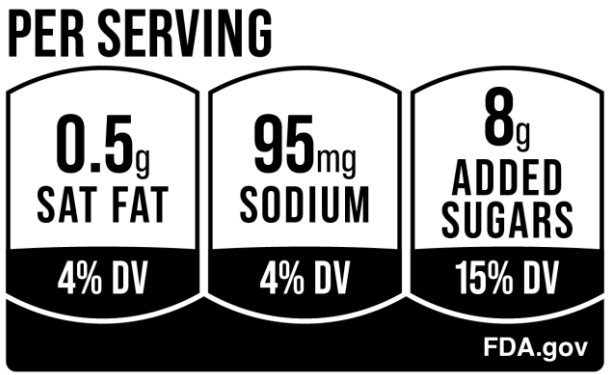
Methods

- 15-minute online questionnaire
- Web panel, U.S. Adults (18+)
- Number of participants = 9,200
- *Part 1 Design*: Repeated Measure
  - Identify "healthiest" and "least healthy" nutrient profile within a scheme
- *Part 2 Design:* Single Product Evaluation

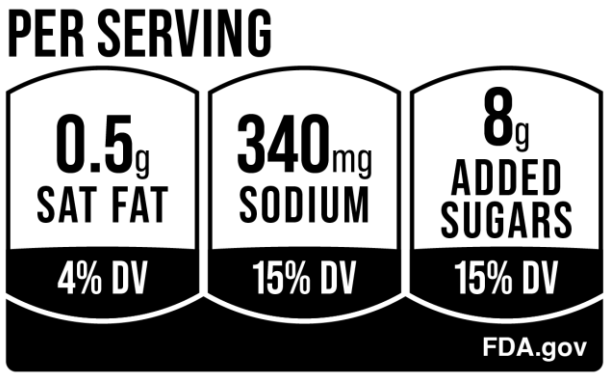


2023 Experimental Study
FOP Schemes Tested

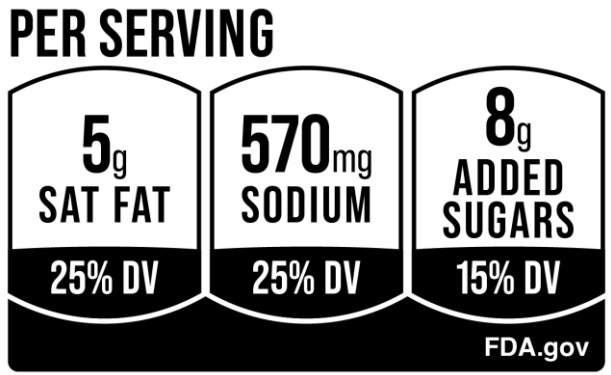
Healthiest



Middle

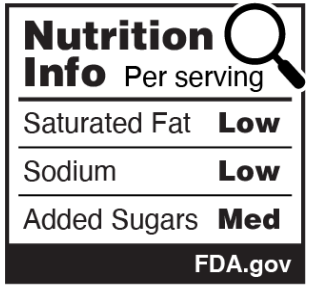
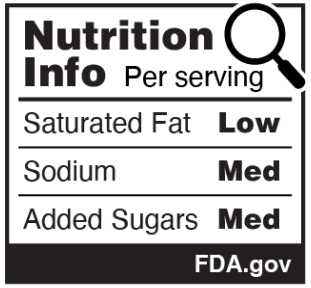
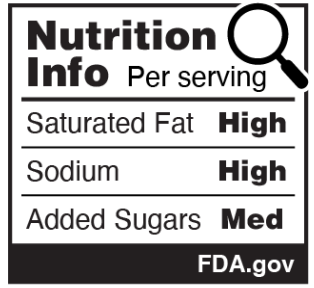
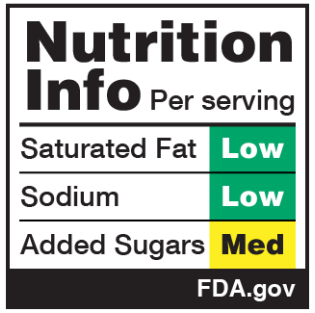
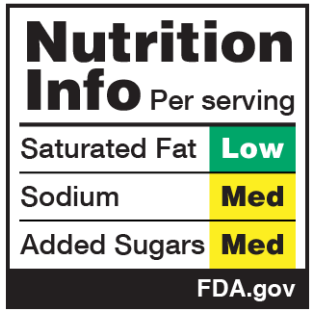
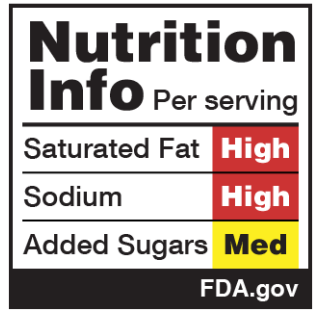


Least Healthy



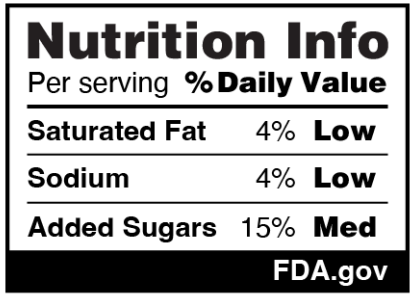
2023 Experimental Study

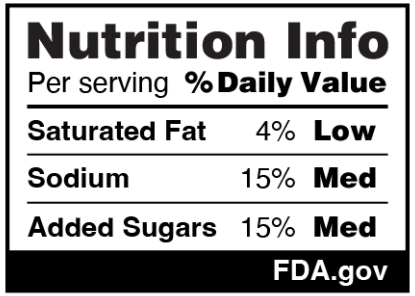
FOP Schemes Tested

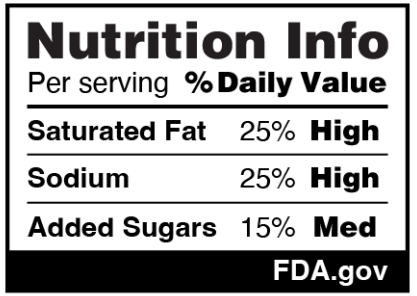
Healthiest	Middle	Least Healthy
		
		
		

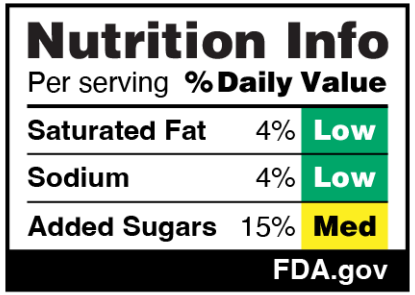
2023 Experimental Study
FOP Schemes Tested

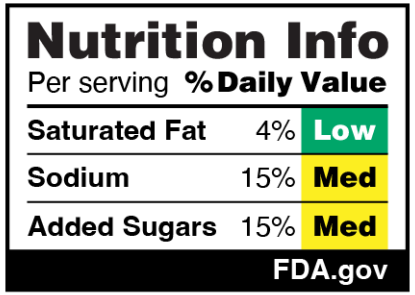
Healthiest	Middle	Least Healthy

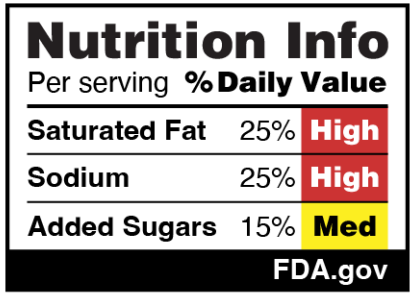




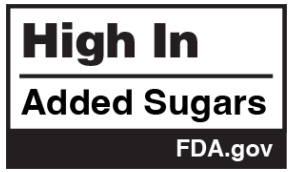
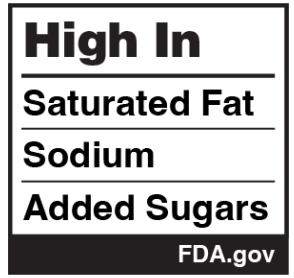
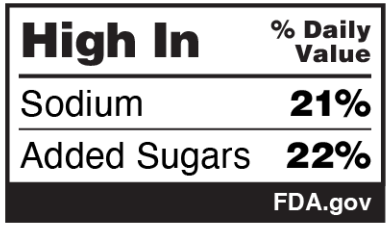
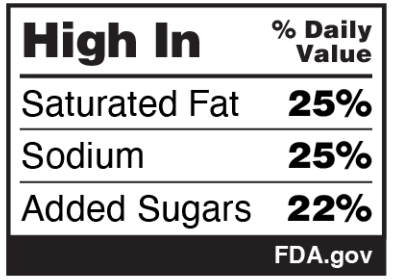






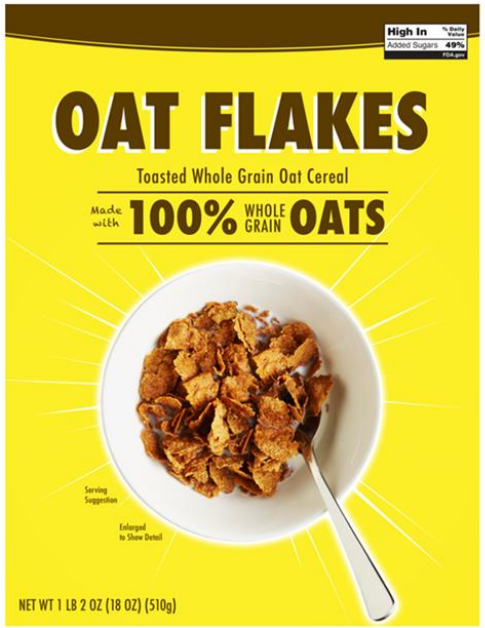


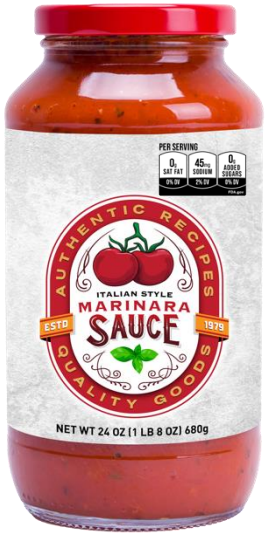
2023 Experimental Study
FOP Schemes Tested

Healthiest	Middle	Least Healthy
		
		

2023 Focus Group Research

Schemes and Mock Products





Themes – Overall

Findings from scientific literature and the consumer research we have conducted to date indicate that:

- An FOP scheme can help consumers identify healthy foods.
- Consumers prefer simple, interpretive FOP labeling schemes
- FOP labels appear helpful for those with lower nutrition knowledge and busy shoppers
- FOP complements the Nutrition Facts label

Engagement & Next Steps


FDA
U.S. FOOD & DRUG
ADMINISTRATION

Why Nutrition Labeling Matters

REAGAN-UDALL FOUNDATION FOR THE FDA

Lauren Fiechtner, MD, MPH
Director of Nutrition, Division of Gastroenterology and General Academic Pediatrics
MassGeneral for Children

Nancy Glick
Director, Food and Nutrition Policy
National Consumers League

Jeffery Lee, MD
Past President
Los Angeles County Medical Association

Lilian Tsi Stielstra
Stroke Survivor

Public Comment

Design considerations
Potential intersection with other nutrition-related policies
International experiences with front-of-package labeling

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Speaker Reminders

- Once introduced, use the “Raise Hand” function to identify yourself. You will then be promoted to panelist. Click “accept” to become a panelist so you can move forward with unmuting your mic/video.
- You will have 10 seconds to begin speaking. If you do not begin speaking within that time frame, we will move to the next commenter.
- The timer will start as you begin to speak and will count down from 2 minutes. Once time runs out, you will be muted, and we will introduce the next commenter.

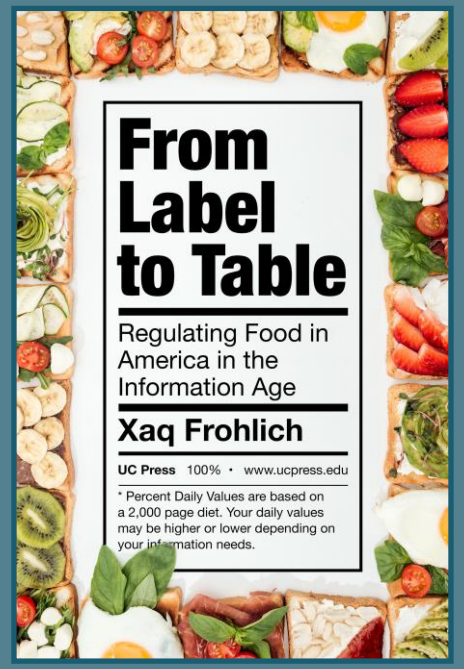
Front-of-Package Nutrition Labeling

AHA supports the development of an FDA FOP system that is:

1. Mandatory
2. Nutrient-specific
3. Includes calories
4. Interpretive
5. Uses a simple design
6. Attention grabbing
7. Uses icon or imagery
8. Uses multi-color (red, yellow, green) or black-and-white color scheme
9. Consistent placement on all product packages (e.g., upper, right corner)

FOP extending “a government brand”

- BNW sets government objectivity apart from colorful marketing
- Nutrition labeling’s impact supersedes literacy:
  - iconographic (emotional) power of FDA nutrition facts
  - companies reformulate foods even if consumers don’t read them
- Consumers don’t read nutrition facts independently from ingredients, because “health” is more holistic than nutrients
- No technical (design) fix to “bad faith” gaming of labeling system
  → only effective solution is a dedicated FDA staff policing the market



Xaq Frohlich, Ph.D.
Auburn University
frohlich@auburn.edu

“Convention improves comprehension. In other words, something that you see over and over and over and over again, across all media or all packaging and the like, gradually becomes iconic and gradually seeps itself in the mind so that you start to, by seeing it over again, understand it and absorb it in ways that supersede reading.”
— Burkey Belser, interview with author October 14, 2009

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Sarah Brandmeier

Consumer Brands Association

Consumer Federation of America
FOP Design Recommendations

- FOP labels should be mandatory
- Should be highly visible and easily understood:
- Should indicate unhealthfulness to best support nutritious choices
  - "Healthy" icon pushes consumers towards packaged goods
- Should include non-sugar sweeteners disclosure
  - Reformulated foods that replace added sugars with other sweeteners may not provide health advantage

One potential variation: High In with yellow background

Thomas Gremillion, Director of Food Policy, CFA, tgremillion@consumerfed.org

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Christina A. Roberto, PhD

Robert Wood Johnson Foundation Healthy Eating Research National Program

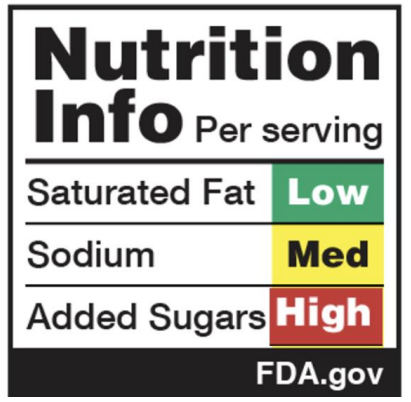
Global Health Advocacy Incubator

Mandatory, clear, single nutrient disclosures avoid confusion and help consumers

Key design considerations:

- Mandatory
- Black and white
- Standardized size
- Contains a symbol
- Focuses only on nutrients of concern
- Developed based on science
- FDA endorsement

Comparing potential FOPL for Lucky Charms cereal

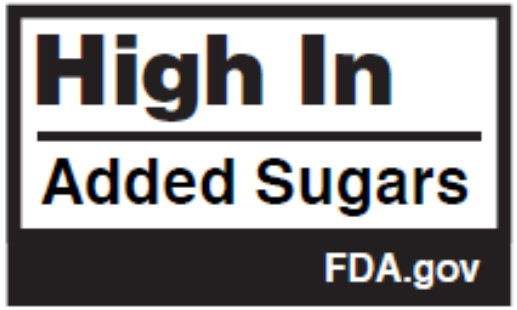


Recommended

**Developed for research purposes by CSPI*

Effective labels

- Graphic
- Simple
- Mandatory
- Nutrients of concern only



Jim Krieger, MD, MPH

UNIVERSITY of WASHINGTON

HEALTHY FOOD AMERICA
Moving Science to Action

REAGAN-UDALL FOUNDATION FOR THE FDA

Michelle Matto, MPH

International Dairy Foods Association

REAGAN-UDALL FOUNDATION FOR THE FDA

Kris Sollid, RD

International Food Information Council

REAGAN-UDALL FOUNDATION FOR THE FDA

Caitlin Boon, PhD

Mars, Inc.

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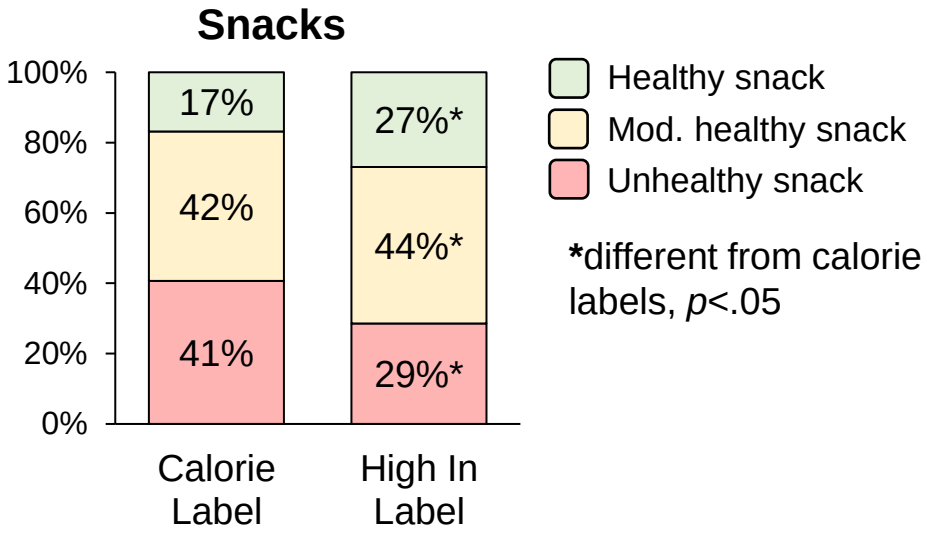
Farida Mohamedshah, MS, CNS

National Confectioners Association

Evidence-based label design recommendations

1. Interpretative labels > numeric labels

- Study: Interpretative “High In” labels increase selection of healthy beverages & snacks by 30%–59% vs. numeric calorie labels[a]

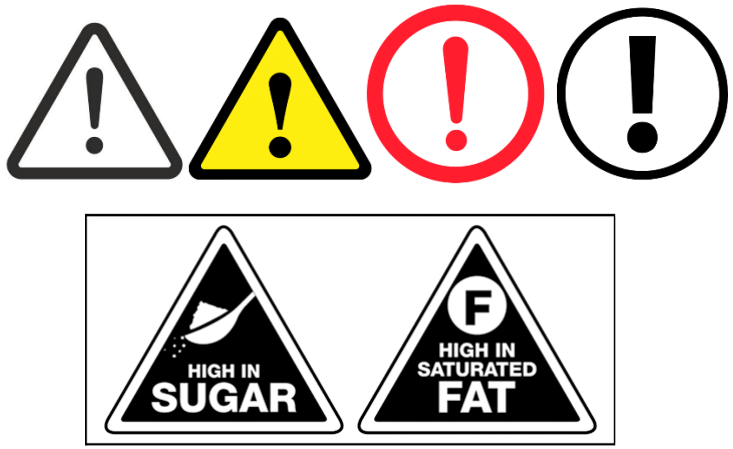


2. Negative labels > positive labels

- Study: Negative labels increased purchase healthfulness by 2x and consumer understanding by 1.5x as much as positive labels[b]

3. Labels with icons > labels without icons

- Study: Labels with icons are perceived as more effective than labels with only text[c]
  - This effect is 2x as strong for people with limited English use[c]
- Consumers like icons[d] and there are many effective designs[e,f]



[a]doi:10.1001/jamanetworkopen.2023.33515; [b]doi:10.1016/j.amepre.2022.08.014; [c]doi:10.1016/j.ypmed.2021.106562; [d] doi:10.1002/oby.22311; [e]doi:10.1371/journal.pone.0257626; [f]doi:10.1016/j.amepre.2022.09.006

Trust for America's Health
TFAH.ORG

Front-of-package Nutrition Labeling: Design Considerations

- **Front-of-package labels should be mandatory**
  - Inconsistent use on products could lead to customer confusion and decrease potential public health impact
- **Front-of-package labels should include an attention-grabbing and easy to understand symbol**
  - Increasing understanding for people with lower literacy rates and limited English proficiency advances health equity
- **Front-of-package labels should only feature top nutrients of concern**
  - To maximize public health impact, only nutrients of concern – sugar, sodium, and fat – should be featured

https://www.tfah.org/report-details/state-of-obesity-2023/

Front-of-package label

- ✓ Nutrients of concern
- ✓ Standardized
- ✓ Mandatory
- ✓ Graphic component

Future considerations

↑ Non-nutritive sweeteners (NNS)

6 flavors
Added sugar plus NNS

10 flavors
Added sugar plus NNS

5 flavors
No added sweeteners

UCONN RUDD CENTER FOR FOOD POLICY AND HEALTH

Fran Fleming- Milici, PhD

Lake Mead East Walmart Henderson Nevada

UNITED STATES CATTLEMEN'S ASSOCIATION

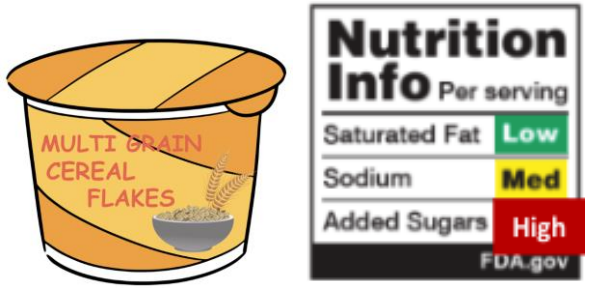
Front of Package Nutrition Labeling

- Differentiate production and processing methods on FDA-regulated products.
- Require prominent and common language labeling.
- Invest greater resources into more staff and enforcement activities.

Schematic Key Based on FDA consumer research	**Low (per serving): ≤5% Daily Value**	**Medium (per serving): 6-19% Daily Value**	**High (per serving): ≥20% Daily Value**

Lighter cereals: Toasted grain flakes, crisped/extruded grains
40g RACC (1 cup serving)
Added Sugar: 9g,18% DV
Dietary Fiber: 3g, 10% DV

Heavier cereals: Shredded wheat biscuits, oat bran with or without additions (e.g., fruits)
60g RACC (1 cup serving)
Added Sugar: 11g, 22% DV
Dietary Fiber: 6g, 20% DV
USDA whole-grain rich, WIC-eligible

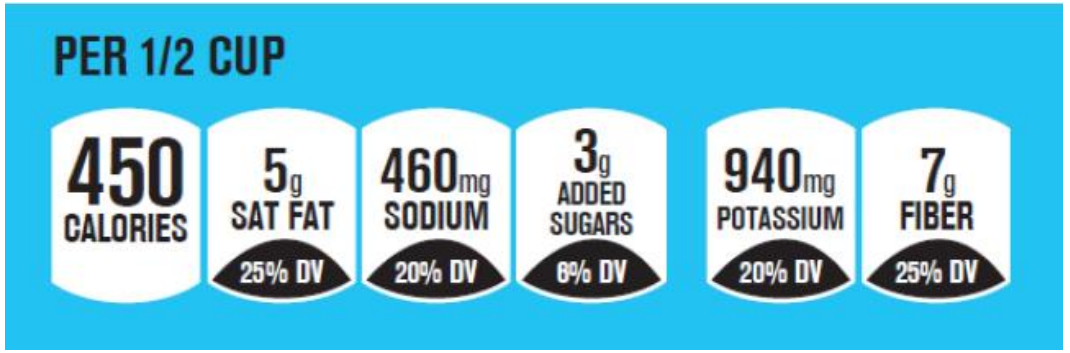


Lighter cereals: Toasted grain flakes, crisped/extruded grains
1 container (70g approx. 2 cups)
Added Sugar: 16g, 32% DV
Dietary Fiber: 5g, 18% DV

It is critical that FOP visuals and the underlying nutrition criteria address variance in RACC sizes and nutrient density to prevent consumer confusion and the unintentional discouragement of nutrient-dense foods.

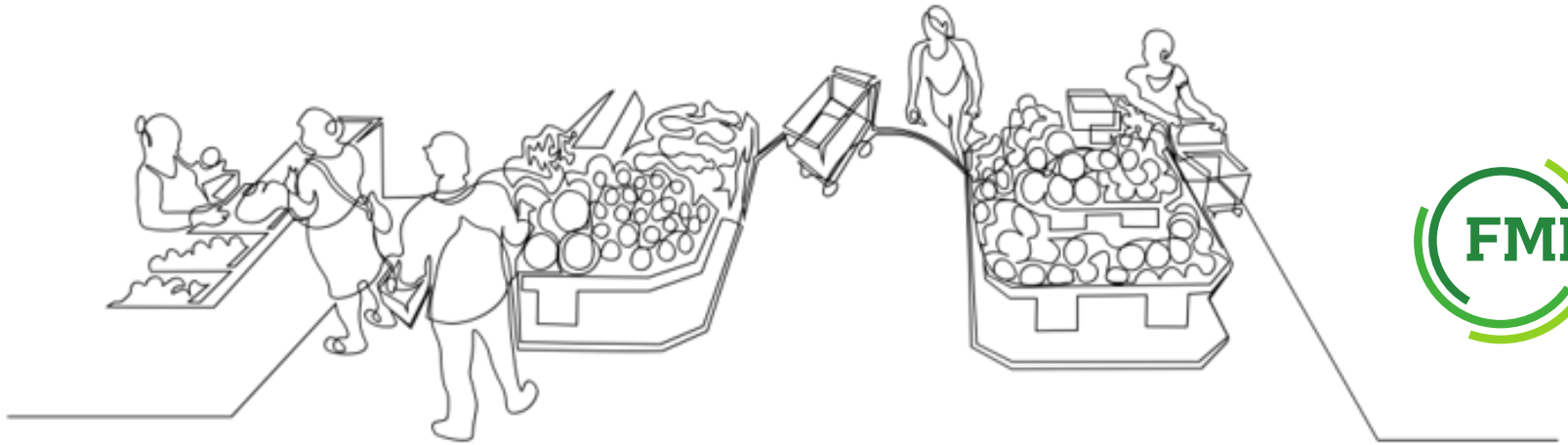
FMI – The Food Industry Association

FMI is the trade association that represents grocers, wholesalers, and food manufacturers.



Example of Facts up Front Labeling Scheme

Designed to allow consumers to easily understand and use key product information "at a glance"



Proposed FDA "Healthy"

NO GUIDANCE*

High In

- Saturated Fat
- Sodium
- Added Sugars

FDA.gov

GUIDING STARS™

Could align with FDA "Healthy"

GUIDING STARS™

Rewards reformulation to get closer to "Healthy"

GUIDING STARS™

Encourages Incremental Improvement

* While FDA may allow certain packaged foods to use a voluntary Dietary Guidance Statement (DGS), we do not believe the DGS will address the lack of guidance on a significant number of foods

REAGAN-UDALL FOUNDATION FOR THE FDA

Lisa Sanders, PhD, RD

Institute of Food Technologists

REAGAN-UDALL FOUNDATION FOR THE FDA

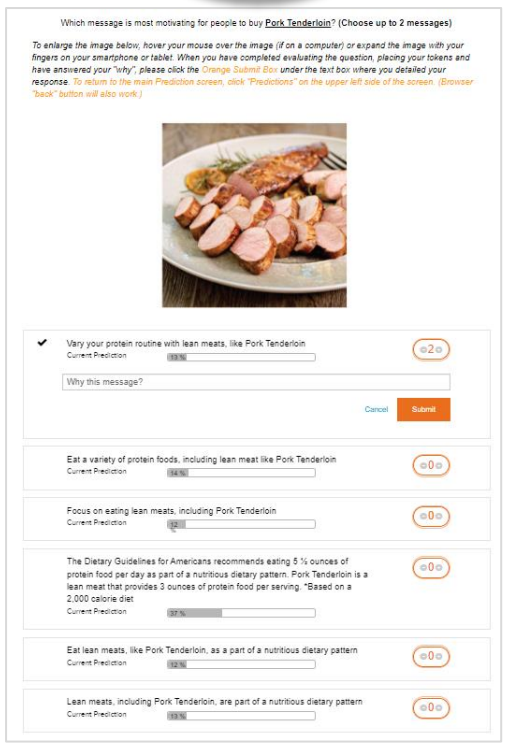
Mollie Van Lieu

International Fresh Produce Association

Consumer Perceptions of Dietary Guidance Statements- Funded by the National Pork Board

1,002

Participants



For Pork Tenderloin	Motivating	Believable	Willing to Pay 5%+ More
The Dietary Guidelines for Americans recommends eating 5½ ounces of protein food per day as part of a nutritious dietary pattern. [protein type] is a lean meat that provides 3 ounces of protein food per serving. *Based on a 2,000 calorie diet	**37%**	**40%**	**57%**
Eat a variety of protein foods, including lean meat like [protein type]	**14%**	**11%**	**60%**
Lean meats, including [protein type], are part of a nutritious dietary pattern	**13%**	**13%**	**55%**
Vary your protein routine with lean meats, like [protein type]	**13%**	**11%**	**60%**
Eat lean meats, like [protein type], as a part of a nutritious dietary pattern	**12%**	**14%**	**63%**
Focus on eating lean meats, including [protein type]	**12%**	**9%**	**74%**

The most motivating and believable message is consistent across all protein types:
"The Dietary Guidelines for Americans recommends eating 5½ ounces of protein food per day as part of a nutritious dietary pattern. [protein type] is a lean meat that provides 3 ounces of protein food per serving. *Based on a 2,000 calorie diet" scores significantly higher than all other messages across all protein types and consumer segments (ethnicity and generation).

- *This message is **motivating** because it is informative, tells consumers that the protein type is healthy and good for them, mentions dietary guidelines, and contains stats / facts / numbers. This sentiment is true across all protein types.*
- *It is **believable** for the same reasons: it is informative, makes consumers feel that it is healthy, discusses the dietary guidelines, and contains stats / facts / numbers.*





Circana. pork pork checkoff

REAGAN-UDALL FOUNDATION FOR THE FDA

Jenny Hopkinson

Sustainable Food Policy Alliance

Reduced sugar does not mean reduced calories.

Nutrition Facts

About 13 servings per container
Serving size 2 tbsp (32g)

Amount Per Serving

Calories 190

	% Daily Value*
Total Fat 16g	**21%**
Saturated Fat 3.5g	**18%**
Trans Fat 0g	
Cholesterol 0mg	**0%**
Sodium 150mg	**7%**
Total Carbohydrate 6g	**2%**
Dietary Fiber 2g	**7%**
Total Sugars 3g	
Includes 3g Added Sugars	**6%**
Protein 7g	
Vitamin D 0mcg	**0%**
Calcium 0mg	**0%**
Iron 0.4mg	**2%**
Potassium 94mg	**2%**
Vitamin A 0mcg	**0%**
Vitamin C 0mg	**0%**
Vitamin E 1.5mg	**10%**
Niacin 3.2mg	**20%**
Copper 0mg	

* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

Original Peanut Butter

Reduced Sugar Peanut Butter

Despite the "1/3 Less Sugar" claim, Calories have increased by 20

Nutrition Facts

About 13 servings per container
Serving size 2 tbsp (32g)

Amount Per Serving

Calories 210

	% Daily Value*
Total Fat 17g	**22%**
Saturated Fat 4g	**20%**
Trans Fat 0g	
Cholesterol 0mg	**0%**
Sodium 100mg	**4%**
Total Carbohydrate 6g	**2%**
Dietary Fiber 2g	**7%**
Total Sugars 2g	
Includes 2g Added Sugars	**4%**
Protein 7g	**7%**
Vitamin D 0mcg	**0%**
Calcium 0mg	**0%**
Iron 0.4mg	**2%**
Potassium 94mg	**2%**
Vitamin E 3mg	**20%**
Niacin 3.2mg	**20%**
Copper 0mg	

* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

Yet, 70% of consumers believe a product labeled "Reduced Sugar" contains less calories than the original version.*

*Findings from consumer research funded by The Sugar Association and conducted by Quadrant Strategies in May 2020, among a national survey of 1,002 U.S. consumers.

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Umailla Fatima

UnidosUS

REAGAN-UDALL FOUNDATION FOR THE FDA

Eva Greenthal, MS, MPH

Center for Science in the Public Interest

Front-of-Package Nutrition Labeling - Colombia's Experience in FOPL

FOPL is a public health measure necessary to regulate package food and beverage products ultra-processed

Legislation

- **Law 2120 of 2021.**

Goal: to Promote Healthy Food Environments and prevent NCDs.

Article 5. FOPL: edible or drinkable products classified according to level of processing.

Using scientific evidence free of conflict of interest.

- **Resolution No. 2492 of 2022. FOPL Regulation**

- "Excess in" warning labels for products that have nutrients of concern above the tresholds.

- It includes the PAHO Nutrient Profile Model on which the NOVA classification is based to define which products should have the seal.

- Ultra-processed product definition Health claims are prohibited for products with labeling.

Nutrient	Solid	Liquid
Sodium	>= 1mg/kcal Limit 300 mg/ 100 gr	>= 1mg/kcal Limit ≥ 40 mg sodium per 100 ml
Sugars	>= 10% of the total energy from free sugars	>= 10% of the total energy from free sugars
Satured fats	>= 10% of the total energy from saturated fats	>= 10% of the total energy from saturated fats
Trans fat	>= 1% of the total energy from trans fats	>= 1% of the total energy from trans fats
Sweeteners	any amount	any amount

Advocacy and mobilization strategy

- Coalition of civil society organization and academia without conflict of interest
- Arguments based on scientific evidence free of conflict of interest: positioning the difference between food and ultra-processed product, ultraprocessing concept.
- Participation in public debate spaces and with wide diffusion
- Mobilization of civil society around the need for FOPL
- Incidence spaces with decision makers policy

FIAN COLOMBIA

International experience with front-of package labeling

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Brazil

2014 - 2016

- Anvisa's Working Group (WG) beginning

2017

- WG conclusion and submission of Idec's proposal

2018

- Anvisa's Preliminary Report: warning model as the most apropriate to inform Brazilian population
- Technical public consultation (TPS)
- Idec's campaign "*You have the right to know what you eat*"

2019

- Anvisa's TPs report
- Anvisa's final text of the regulation
- Public consultation for Brazilian population

23 thousand contributions

2020

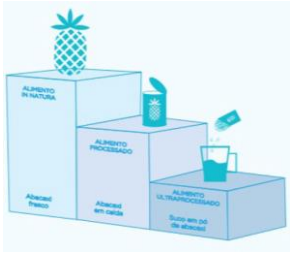
- Anvisa approves a magnifying glass as a new FoPNL, in a remodeled version

- **Great improvement for Consumers**, even with some **limitations**
- Corporate political activities of F&B industry led the approval of the **magnifying glass**

Resolution of Collegiate Board (Resolução da Diretoria Colegiada – RDC) no. 429/2020 and **Normative Instruction (Instrução Normativa – IN) no. 75/2020**

High in	Solid and semi-solid	Liquid
Added sugar	≥ 15 g/100 g	≥ 7.5 g/100 ml
Saturated fat	≥ 6 g/100 g	≥ 3g/100 ml
Sodium	≥ 600 mg/100 g	≥ 300 mg/100 ml

- **Started in oct/2022**
- **Until oct/2023:** products that were already on the market
- **Until oct/2024:** small businesses products
- **Until oct/2025:** non-alcoholic beverages in returnable packaging

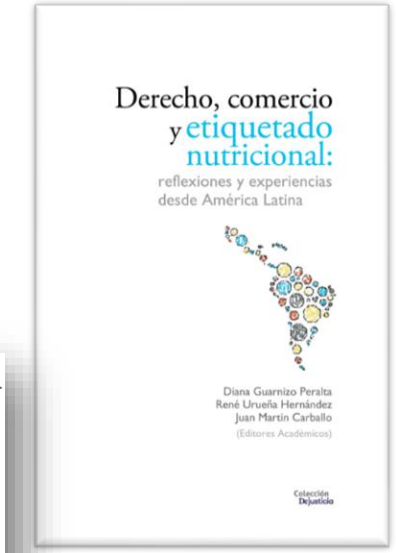


Limitations tranformed into improvements

- **Warning for sweeteners**
- **Nutrient profile model**
- **Sinergy with the Brazilian Dietary Guideline (Guia Alimentar para a População Brasileira)**

Mexico's Experience with Warning Labeling

2019



2022

2020

PLOS MEDICINE

RESEARCH ARTICLE

Evaluation of the Mexican warning label nutrient profile on food products marketed in Mexico in 2016 and 2017: A cross-sectional analysis

Alejandra Contreras-Manzano, Carlos Cruz-Casarrubias, Ana Munguía, Alejandra Jáuregui, Jorge Vargas-Meza, Claudia Nieto, Lizbeth Tolentino-Mayo, Simón Barquera

PLOS MEDICINE

RESEARCH ARTICLE

Predicting obesity reduction after implementing warning labels in Mexico: A modeling study

Ana Basto-Abreu[1], Rossana Torres-Alvarez[1], Francisco Reyes-Sánchez[1], Romina González-Morales[1], Francisco Canto-Osorio[1], M. Arantxa Colchero[2], Simón Barquera[3], Juan A. Rivera[4], Tonatiuh Barrientos-Gutierrez[1]*

Durán et al.
Health Research Policy and Systems (2022) 20:108
https://doi.org/10.1186/s12961-022-00922-2

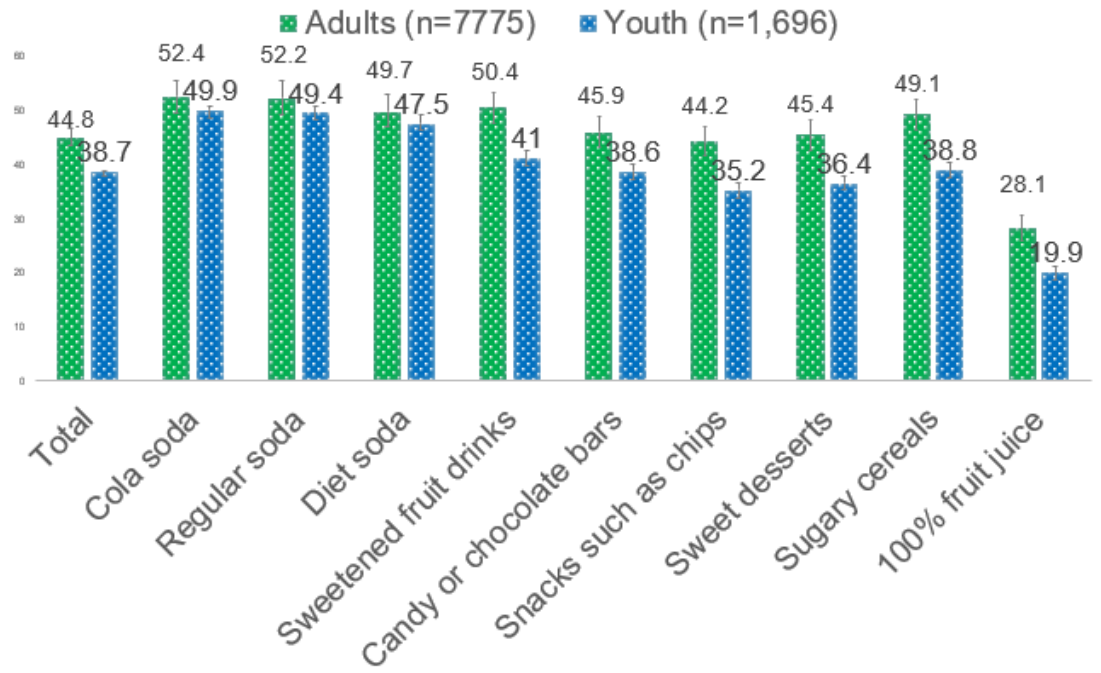
Health Research Policy and Systems

RESEARCH Open Access

Analysis of stakeholders' responses to the food warning labels regulation in Mexico

Regina Durán[1], Edalith Asmitia[1], Juan Rivera[2], Simón Barquera[1] and Lizbeth Tolentino-Mayo[1]*

Which food groups have people stopped buying the most?



@1CINyS
@CINyS, @NOM_051 y @elpoderdelc
Centro de investigación en Nutrición y Salud
El Poder del Consumidor

Mandatory front-of-package (FOP) nutrition labelling in Uruguay

Gastón Ares (Universidad de la República)

Before implementation

Extensive amount of research to design the policy. Key learnings:

- Importance of **interpretive elements.**
- **Highlighting products high in nutrients associated with NCD** was the most effective strategy to improve understanding and encourage healthier food choices.
- **Importance of graphic design** to maximize impact.

After implementation

Improvement in consumer understanding of nutritional information.

6 out of 10 consumers report using FOP nutrition labelling when making their food purchases (**stable since implementation**).

FOP nutrition labelling **discourages purchase of products high in nutrients associated with NCDs**.

No negative effects on the food industry.

Chilean Law of Food Labeling and Advertising

Changes in grocery purchases following mandatory warning labels

After 3 years of regulation,* significant changes in food & beverage purchases.

Among unhealthy products purchased with warning labels:

CALORIES

↓ **23%**

or 52 kcals per person per day

SUGAR

↓ **37%**

or 30 calories from sugar per person per day

Sugar decline as impactful as a sugary drink tax

SATURATED FAT

↓ **16%**

or 6 calories from sat. fat per person per day

SODIUM

↓ **22%**

or 86 mg per person per day

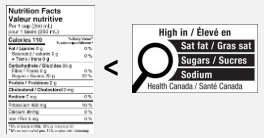
BARRY M. POPKIN • GLOBAL FOOD RESEARCH PROGRAM at UNC-CHAPEL HILL

** Unpublished results*

Front-of-pack Labelling (FOPL): Lessons from Canada and beyond

1) FOPL **improves diet quality & dietary intakes** and ultimately, health outcomes.

Easily noticed*,[1-4]



Easily understood (i.e., healthfulness)*,[5-7]

Changes behaviours[4,8]

*including individuals with lower health literacy

Reformulations by manufacturers[9-13]

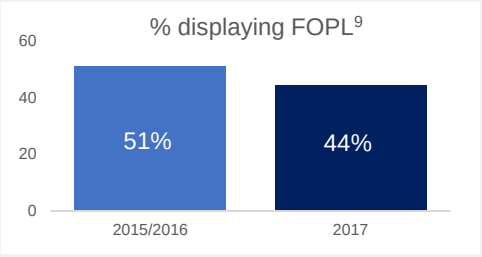
Improved diet quality & dietary intakes → Improved health outcomes[14,15]

2) **Mandatory** FOPL is needed.

Mandatory

Chile (2016)

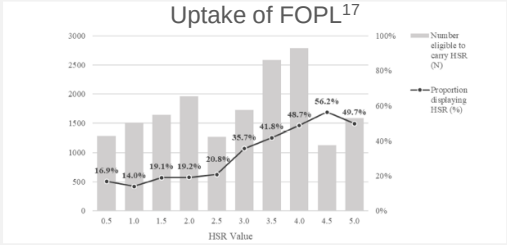
100% compliance



Voluntary

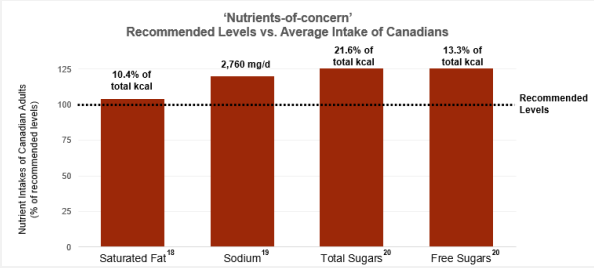
Australia (2014)

~40% compliance; mostly by "more healthy" products[16,17]

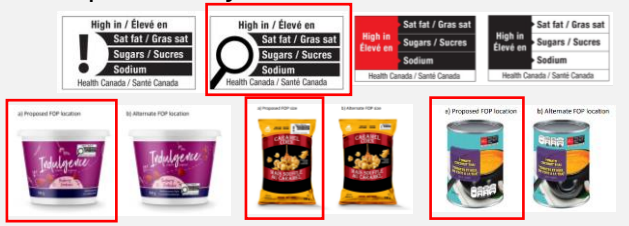


3) Regulations must be **clear** for maximum benefits.

A. Nutrients based on excessive intakes:



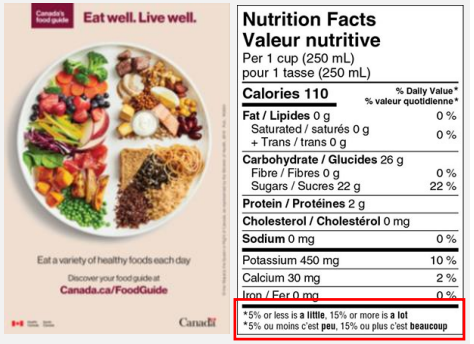
B. Design to be interpretive & prominently located[8,21]:



C. Reference values & thresholds:

- Per serving size
- Per 100 g or 100 ml
- Per 1,000 kcal

D. Consistency



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Food and Nutrition Policy Research for Population Health

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Thank you!