Center for Science and Democracy at the Union of Concerned Scientists

FACT SHEET

Transparency in Food Labeling

Food Labels Inform Consumer Choices—and Industry Pushes Back

HIGHLIGHTS

Americans are increasingly interested in knowing what's in their food. But any time labeling proposals are put forth to help consumers make healthier choices, the food industry revives its tried-and-tested approach to sow confusion and stall progress. Food companies and trade organizations repeatedly make false claims about consumers' ability to understand nutrition labels, defending their assertions with poorly designed and misleading studies.

Studies from independent researchers and government agencies show that accurate food labeling can benefit consumers. It is time for the food industry to retire its tired claims, and accept what evidence has shown and what consumers want: clear, science-based, comprehensive nutrition labeling that will empower people to make informed decisions about the food they eat.

Since the 1990s, the Food and Drug Administration (FDA) has required food companies to include Nutrition Facts labels on product packaging. This labeling was deemed necessary by the FDA following decades of misleading and untruthful health claims on food packages that were hindering consumers from meeting nutritional recommendations developed by scientists and public health professionals (Nestle 2002). Numerous independent studies have inextricably linked poor diets to obesity and chronic disease, and the Nutrition Facts label has been a critical tool in helping consumers better navigate food decisions (IOM 2010). Nutrition labeling has also expanded to menus in restaurants around the United States to help inform consumer purchases outside of grocery stores.

The Value and Benefits of Food Labeling

Consumers are interested in making informed decisions about the food they purchase. A study using nationally representative data found that 76 percent of adults reported reading the Nutrition Facts label when purchasing packaged foods (Bleich and Wolfson 2015), and a national survey showed that information about sugar has been used consistently by more than 60 percent of consumers since the Nutrition Facts label was first introduced (Todd and Variyam 2008). Similar findings were shown at the local level as well; among 650 African American adults in

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Since its passage in 1990, the Nutrition Facts label has been a critical tool in helping consumers better navigate food decisions. Over this time, the food industry has tried to undermine efforts to improve and update the label.

North Carolina, 78 percent reported reading nutrition labels. Further, women, older adults, high school–educated adults, and obese individuals are more likely to read labels than others (Satia, Galanko, and Neuhouser 2005). While labels are not used to the same degree by everyone, it might be due less to a lack of interest and more to a lack of understanding of how a product's ingredients affect health (Ollberding and Contento 2010; Rothman et al. 2006).

LABELING INFORMS HEALTHIER FOOD DECISIONS

Not only are most individuals likely to *read* nutritional information labels, but those who are aware of the relationships between diet and disease are more likely to *value* the information. Consumers with certain dietary restrictions or illnesses, such as high blood pressure or high cholesterol, are more likely to look at food labels to ensure that their dietary choices are in line with their doctor's recommendations (Kreuter et al. 1997). For example, Nutrition Facts labels have been shown to help people limit their fat intake (Satia, Galanko, and Neuhouser 2005; Neuhouser, Kristal, and Patterson 1999). Further, although not an explicit goal, labeling requirements related to a specific ingredient tend to push food companies to reformulate their products to reduce that ingredient (Masunaga 2015). Following the FDA's required labeling of trans fats in 2003, the food industry estimated that it had reduced trans fats content in foods 86 percent by 2015, and that consumption of trans fats dropped by 78 percent between 2003 and 2012 (Tavernise 2015). A nationally representative study found that after trans fats were labeled and reduced in foods, trans fat levels in non-Hispanic white adults were reduced significantly (Vesper et al. 2012).

LABELING GUIDES HEALTHIER DINING CHOICES

While there are mixed findings on whether menu labeling influences consumer purchasing decisions, several studies show it can encourage lower-calorie purchases at full-service chain restaurants, coffee shops, and in cafeteria settings (Finkelstein et al. 2011; Elbel et al. 2009; Bassett et al. 2008; Roberto, Khandpur, and VanEpps n.d.). For example, consumers who read restaurant menus with calorie-content information ordered foods with significantly lower calories than those who ordered foods from the same menu without that information (Roberto et al. 2010; Bassett et al. 2008). Research on fast food menu labels shows that regardless of whether consumers are attempting to lose weight or not, they report using nutrition information to make purchasing decisions (Bleich and Wolfson 2015). And researchers looking at county-level data in locations that had adopted calorie labeling in restaurants found that there was a statistically significant decrease in body mass index for overweight women, and for healthy weight, overweight, and obese men; the higher the weight, the more significant the results, likely because these individuals are more information-sensitive (Deb and Vargas 2016; Restrepo 2016).

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Nutrition labeling has expanded to menus in certain restaurants and other food service establishments around the United States, and several studies show that it can encourage lower-calorie purchases.

The Food Industry's Opposition to Labeling

Despite the value of, and consumers' demand for, clear nutrition labeling, the food industry has a long history of opposing labeling efforts (Kyle and Thomas 2014; Nestle 2002). When the FDA first issued its rule mandating nutrition labeling in 1990, food companies and trade associations opposed the rules because of a fear that some foods would appear less healthy than others and that the FDA's rule was acting to "protect consumers against themselves" (Nestle 2002). Frito-Lay, a snack food subsidiary of PepsiCo, asserted, "it is certain that should all of the information that the FDA is currently proposing be included on a label, it would overwhelm and easily exceed the capacity of the average consumer to understand it" (Frito-Lay, Inc. 1990).

More than 25 years later, the Nutrition Facts label is on virtually all US food packaging, but the food industry has still tried to undermine the FDA's efforts to improve and update the label. Most recently, the FDA proposed a rule in 2014 that,

among other changes, would require food companies to add a line listing the amount of "added sugars" and the percent daily value (%DV)[1] that amount represents on the Nutrition Facts label (FDA 2015a). The FDA's proposal reflected scientific evidence that links excessive sugar consumption to tooth decay, type 2 diabetes, and cardiovascular diseases (HHS and USDA 2015). Our analysis of the public comments submitted in response to the "added sugars" line showed that the food industry provided the majority of comments opposing it, while the public health and academic communities provided comments overwhelmingly supporting it (UCS 2015). Despite industry pressure, the FDA finalized the "added sugars" line in 2016 (Federal Register 2016), marking a major win for the public's right to know what goes in their foods.

One of the most commonly used industry arguments to oppose labeling efforts has been that it would mislead or confuse consumers. However, the food industry has little independent scientific information to support this claim and instead uses several different tactics to create doubt surrounding the utility of food labels.

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Consumers have a right to science-based nutritional information about the foods they eat and feed their children. Clear, comprehensive nutrition labeling helps and empowers consumers to better navigate food decisions.

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SOWING DOUBT TO YIELD A DESIRED MESSAGE

In a 2014 survey of 500 US adults, 63 percent of respondents thought that the FDA's proposed "added sugars" line would be helpful, while just 18 percent thought that the label would be confusing (Kyle and Thomas 2014). And in 2015, the FDA released a study in which 160 participants compared Nutrition Facts labels both with and without an "added sugars" line; when participants were asked to identify the amount of added sugars, the proposed label made it easier for participants to do so (FDA 2015b). Despite these findings, the Food Marketing Institute, a food retailer trade organization, tried to inject uncertainty by questioning "whether consumers will correctly interpret the proposed added sugars declaration in the context of an overall, balanced diet" (FMI 2015).

CONDUCTING IN-HOUSE STUDIES WITH FLAWED PARAMETERS

The International Food Information Council (IFIC), a group financed by some of the largest multinational food companies and with a board comprised predominantly of food industry representatives, released a study on how consumers will perceive an "added sugars" line (Laquatra et al. 2015; IFIC n.d.). Despite its own findings that the majority of consumers (81.4 percent) who read nutrition labels also rely on the ingredients list, the IFIC study design only allowed respondents to look at the current Nutrition Facts label, and not an accompanying ingredients list. Nor did the study evaluate how the "added sugars" line would affect actual food purchasing (Laquatra et al. 2015). Despite conducting a study with incomplete information, the IFIC concluded that its "data support the misleading nature of including an 'Added Sugars' line on the [Nutrition Facts Label] by potentially altering the way consumers judge the healthfulness of a product, thus affecting the likelihood of purchasing said product" (IFIC 2015).

1 *This value represents the extent to which a nutrient in a particular food contributes to one's total daily recommended allowance of that nutrient, based on a 2,000-calorie diet.*

Labeling plays a pivotal role in a multifaceted approach to encouraging healthier food choices by enabling consumers to make informed decisions.

Similarly, a General Mills study that asked respondents to report how much total sugar was in a product did not ask about "added sugar" (General Mills, Inc. 2015). Despite having no clear input from respondents on added sugar, General Mills stated that "an added sugars declaration creates confusion and decreases understanding of total sugar content . . . ." (General Mills, Inc. 2015).

SHIFTING FOCUS TO CONSUMER CHOICE

Some companies simply divert attention from the scientific evidence with unsupported claims about labels, leading to consumer confusion. For example, based on the government's 2015 *Dietary Guidelines for Americans* that recommends individuals two years and older to consume less than 10 percent of calories per day from added sugars, the FDA proposed to include a %DV for added sugars on the Nutrition Facts label (HHS and USDA 2015; FDA 2014). Nevertheless, Campbell Soup Company argued that an "added sugars" line "could confuse consumers by taking their focus off of calories and causing them to mistake one food as being a better food choice when in reality it is equivalent" (Campbell Soup Company 2014). Similarly, Kraft Foods Group asserted that the "added sugars" line "will distract consumers from the overall focus on total calorie intake from all macronutrient sources and not aid them in maintaining healthy dietary patterns" (Kraft Food Group, Inc. 2014).

Consumers Want More Information, Not Less

While labeling on its own will not solve the nation's obesity crisis nor rid the nation of other diet-related chronic diseases, it plays a pivotal role in a multifaceted approach to encouraging healthier food choices by enabling consumers to make informed decisions. Consumers have a right to science-based nutritional information about the foods they eat and feed their children, and our federal agencies have the responsibility to require food labels to reflect current scientific evidence and safeguard public health, whether or not the food industry objects. Instead of opposing labeling, the food industry should support consumers' right to know and, ideally, reformulate its products to give consumers truly healthier food choices.

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