

## AICR's Federal Priorities: Nutrition Labels and Tools to Identify Healthier Options

### Background

A growing body of evidence supports the relationship between dietary factors and chronic disease. Nearly 40 percent of all cancer cases are preventable by leading a healthy lifestyle, including maintaining a healthy weight, eating a nutritious diet, and being physically active.<sup>1</sup>

To help people reduce their risk of cancer, AICR provides [10 Cancer Prevention Recommendations](#). Similarly, the U.S. government issues evidence-based dietary recommendations in the [Dietary Guidelines for Americans](#). Unfortunately, consumer understanding of how to follow this advice is low. For example, the average score on the Healthy Eating Index (HEI-2015) is 59 out of 100, indicating that the diets of most Americans do not align with the dietary recommendations.<sup>2</sup>

To support people in making healthy choices that align with AICR's Cancer Prevention Recommendations and the Dietary Guidelines, AICR supports updates to nutrition labels and food standards that incentivize production of more nutritious options and give consumers the information and tools to make better choices. AICR also advocates for consumer education about these tools and how to use them in their everyday lives.

### Nutrition Innovation Strategy

In 2018, the U.S. Food and Drug Administration (FDA) introduced the [Nutrition Innovation Strategy](#) - an initiative to assess the role nutrition and diet play in preventable death and disease. It has six pillars including modernizing health claims, ingredient labels and product standards, implementing the updated Nutrition Facts label and menu labeling, supporting consumer education, and reducing sodium. AICR submitted a [letter](#) to the FDA commending them for this initiative, urging them to use their authority to make it easier for consumers to identify healthy options, while also incentivizing companies to reformulate foods to help promote and diversify the healthy options that play a role in a healthy, cancer-protective diet.

Nutrition Facts	
16 servings per container	
Serving size 1 Tbsp. (21g)	
Amount per serving	
<b>Calories 60</b>	
% Daily Value*	
Total Fat 0g	0%
Saturated Fat 0g	0%
Trans Fat 0g	
Cholesterol 0mg	0%
Sodium 0mg	0%
Total Carbohydrate 17g	6%
Dietary Fiber 0g	0%
Total Sugars 17g	34% <sup>†</sup>
Protein 0g	
Vitamin D 0mcg	0%
Calcium 0mg	0%
Iron 0mg	0%
Potassium 0mg	0%

\* 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.  
<sup>†</sup> One serving adds 17g of sugar to your diet and represents 34% of the Daily Value for Added Sugars.

Source: FDA

### The Nutrition Facts Label

To support Americans making more informed choices regarding the calorie and nutrient content of packaged foods and drinks, FDA required that most manufacturers update the Nutrition Facts Label on their products as of January 1, 2020 to reflect current nutrition science on the relationship between diet and disease. The updated label makes calories and serving size larger and more prominent to help with managing weight, a leading cancer risk factor, and includes added sugar content. Added sugars are those added during packaging or processing and supply excess calories without any nutrients, contributing to weight gain.

AICR supported these updates throughout the policymaking process at FDA and continues to support their implementation. In 2015, AICR submitted a [comment letter](#) on FDA's proposed rule, commending the proposed addition of added sugars to the label. In 2020, we held a [webinar](#) in conjunction with FDA officials to discuss how the new Nutrition Facts

label can be a tool in helping consumers identify healthy options and issued [updated resources](#) for health professionals to use in educating their patients about how to use the label. AICR will continue to be an active voice in empowering consumers and health professionals to use the label to make healthful choices based on sound evidence.

## Menu Labeling

AICR also supports providing calorie counts on restaurant menus. Americans have been spending an increasing amount of money on food from restaurants, convenience stores, and other venues. In fact, more than half of the total U.S. food expenditures in 2018 was on food prepared and eaten outside of the home.<sup>3</sup> The inclusion of calories on menus contributes to the ability of consumers to make informed decisions about their eating habits and better manage their weight, reducing cancer risk. AICR was [supportive of the implementation of this policy in 2018](#) and continues to support the FDA in educating key stakeholders about the availability of the calorie information and how to use it to make more informed food choices.



Source: FDA

## Standards of Identity

In September 2019, the FDA held a public meeting on their efforts to modernize Standards of Identity, a key element of the Nutrition Innovation Strategy. The FDA defines food standards of identity (SOI) as requirements for what a product must contain, the ingredients it may contain, and any manufacturing requirements.<sup>4</sup> SOIs protect consumers by ensuring product labeling accurately reflects the product's contents.

AICR [urges FDA](#) to ensure that any changes to the SOI, and particularly horizontal changes, align with AICR's Cancer Prevention Recommendations and the *Dietary Guidelines for Americans*, coordinate with other elements of the Nutrition Innovation Strategy, consider potential unintended consequences, and be accompanied by consumer education. In particular, AICR recommends updates to SOI for grain products and that FDA require grain products label the percentage of whole grains contained. This would help to reduce consumer confusion and encourage production of whole grain products, which are currently under consumed by the population.<sup>5</sup> AICR supports the FDA in their efforts to update SOIs and will continue to monitor this element of the initiative to ensure that these updates help empower consumers to make healthy, cancer-protective choices.

## Healthy Claim

As part of their Nutrition Innovation Strategy, FDA also announced that they would consider updating regulations for what it means for a food to be considered "healthy" to align with current nutrition science and create a symbol to denote foods that meets that criteria. AICR is generally supportive of updating the regulations to reflect the current state of the evidence, and we will continue to monitor the activity on this issue to ensure that any changes improve diet and help to reduce consumer confusion.

## Additional Food Labeling Priorities

AICR also supports additional label changes that make it easier for people to make healthy choices to reduce their cancer risk. In particular, AICR advocates that FDA require grain products to label the percent whole grain they contain. AICR's research has shown that whole grains decrease the risk of colorectal cancer, but Americans of all ages are consuming too few whole grains and too many refined grains. Consumer surveys suggest that lack of whole grain products in the marketplace and consumer confusion about which products are whole grain may be contributing to the low levels of consumption. For example, a nationally representative survey of 1,500 consumers conducted in 2018 by the Oldways Whole Grain Council found that 64% of consumers say they are making at least half of their grains whole and nearly half of this

number say they are almost always choosing whole grains. However, the stark contrast between the number of consumers who say they choose grains compared with what Americans are actually eating suggests that confusion exists about whether products are comprised of whole grains or only partially so. Currently, for products that are made with both whole grains and refined grains, there is no way for the consumer to know what percentage of the product is whole versus refined grain, and consumers may inadvertently be misled by claims such as “made with whole grain” or labeling that indicates a product is made with wheat flour or is multi-grain or the product or its packaging is brown in color.<sup>6</sup> FDA should consider changes to labeling requirements for grain products to address this consumer confusion and increase whole grain consumption.

Additionally, AICR recommends that FDA consider developing a national standardized front-of-package labeling system to help consumers quickly identify healthier foods both within and across food categories. Development of such a symbol or system should be informed by consumer testing of a range of systems, existing research and rules on front-of-package systems around the globe, and an evaluation of their impact on consumer choices and reformulation. Front-of-package labels contribute to consumer understanding of healthful items by putting nutrition information within plain sight of the purchaser and helping them make sense of the information on the Nutrition Facts label. AICR supports FDA developing a front-of-pack label that makes it easier for consumers to identify healthy options.

## Conclusion

Given the established relationship between diet and chronic disease, AICR advocates for a marketplace where consumers have greater access to healthy options and information and tools to make more informed decisions. This can be achieved through increased labeling transparency and incentives for production of nutritious foods.

For more information about AICR’s federal policy priorities and how you can get involved, please visit <https://www.aicr.org/impact/policy-advocacy> or contact [k.kiefer@aicr.org](mailto:k.kiefer@aicr.org).

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<sup>1</sup> WCRF/AICR. *Diet, Nutrition, Physical Activity and Cancer: A Global Perspective*. 2018. Available at [dietandcancerreport.org](http://dietandcancerreport.org).

<sup>2</sup> U.S. Department of Agriculture. “HEI scores for Americans.” 2019. Available at <https://www.fns.usda.gov/hei-scores-americans>

<sup>3</sup> The American Farm Bureau Foundation for Agriculture. “U.S. Food Expenditures at Home and Abroad.” 2019. Available at <https://www.fb.org/market-intel/u.s.-food-expenditures-at-home-and-abroad>.

<sup>4</sup> U.S. Food and Drug Administration. “CFR- Code of Federal Regulations Title 21.” Updated 2019. Available at <https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?CFRPart=130>

<sup>5</sup> U.S. Department of Health and Human Services and U.S. Department of Agriculture. *2015-2020 Dietary Guidelines for Americans*. 8<sup>th</sup> Edition. December 2015. Available at <http://health.gov/dietaryguidelines/2015/guidelines/>.

<sup>6</sup> Wilde, P., Pomeranz, J.L., Lizewski, L.J. & Zhang, F.F. 2020. “Consumer confusion about whole grain content and healthfulness in product labels: A discrete choice experiment and comprehension assessment.” *Public Health Nutrition*, forthcoming.