# Lessons from Nutrition Labeling: Content, Format and Evaluation

#### Alan S. Levy Consumer Studies Food and Drug Administration



- First, from the marketplace
  - Rising consumer awareness of dietary risk factors—produced by consumer education efforts of a government/public health/industry collaboration
  - New product introductions
  - Consumer confusion—Tower of Babel



- Second, from the experts
  - Prioritized public health importance of various nutrients.
  - Established standardized nomenclature
    - e.g., what's high, what's low.
  - Determined level of detail to disclose
    - e.g.,sat fat, not other fatty acids.
  - Public health policy decisions—not communication decisions

#### Third, from the law

- Defined the purpose—to inform consumers by disclosing nutritional characteristics of products in the context of the total diet.
- Defined the scope of application—virtually all packaged foods covered.
- Required uniform presentation.



- Fourth, from the coordination between the marketplace, experts and the law.
  - Consumers were educated by public health experts to want the information that the law required to be on product labels.
  - Consumers saw nutrition labeling as meeting a need they already had.
  - They did not learn about that need when they read the label.

# Where did the format come from?

- Alternative formats suggested by interested parties--industry, public health experts, consumer groups and regulators--were tested and evaluated.
- Performance, not preference, was the measure.
- Performance was defined in terms of ease of use and accuracy for specific label uses.

## **Performance Depends on Purpose**

- You have to know what people use the label for before you can measure its performance.
- First you ask people what they are going to do with the label.
- Then you define a task (or tasks) that capture these uses.

Then you can measure performance.

# **Kinds of Tasks: Nutrition Labeling**

- One product/Two product Tasks
  Product rating/Product selection
- Realistic tasks
  - Evaluate front panel claims
  - Which nutrients are high/low
  - Likely dietary impact
  - Which would you buy



# **Kinds of Tasks: Privacy Disclosures**

- One product/Two product Tasks
   Product rating/Product selection
- Realistic tasks
  - Opt in/Opt out
  - Which would you buy
  - Information search



## **Control Groups**

- Product rating tasks—with and without privacy disclosures.
- Product selection tasks—multiple privacy disclosure formats.



# **Evaluation**

- Market Impact
  - New product introductions
    - Type and market share
  - Advertising
  - Label usage
    - Frequency of use
    - Different possible uses
    - Perceived credibility



## **Evaluation**

- Consumer Acceptance
  - Value added information
    - tells you something you don't know that you want to know
  - Perceived Purpose
    - information always has a purpose
    - your interest or mine?
    - Consumers don't know the regulations.



## **Evaluation**

- Consumer Acceptance
  - Label design-consumers as critics
    - legible
    - comprehensible
    - ease of use
    - serves its intended purpose.



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