The Center for Science in the Public Interest (CSPI), the Association of SNAP Nutrition Education Administrators (ASNNA), and the Association of State Public Health Nutritionists (ASPHN) submitted a Citizen Petition to FDA that requested an amendment to the regulations to require front-of-pack nutrition labels. The citizen groups asked that 21 CFR 101 be amended to require on the principal display panel of a food an easy-to-understand, standardized system that is (1) mandatory, (2) nutrient-specific, (3) includes calories, and (4) is interpretative with respect to levels of added sugars, sodium, and saturated fat per serving.

The groups argue that current US food labeling requirements (i.e., the Nutrition Facts Panel (NFP)) and voluntary industry initiatives (i.e., Facts Up Front) have low utilization and are insufficient to promote healthy diets. They further cite to experimental studies and example countries that have already implemented interpretative front of pack nutrition labeling and which have seen improved
health outcomes. For instance, the groups explain that after Chile adopted a mandatory nutrient warning label policy in 2016, there were statistically significant reductions in purchases of calories (-3.5%), sugars (-10.2%), saturated fat (-3.9%), and sodium (-4.7%) (all p<0.05). The groups encourage the FDA to learn from “experiences abroad and follow the science to select a system with the greatest potential to promote equitable access to information, improve diets, promote reformulation, and advance public health.”

- The petition includes examples of labels that would meet the four-pronged criteria, including warning labels that would alert consumers to high levels of nutrients, and traffic light labels that rate the levels of nutrients as high, medium, or low. Other formats, like Nutri-Score (i.e., assigning the product an A, B, C, D, or E score) or Health Star Ratings (i.e., assigning a product a number of stars out of a total of 5 stars) would not meet the criteria because they are not nutrient-specific and interpret the overall healthfulness of the food as opposed to specific nutrient levels.

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