

**Comments of the Staff of the Bureaus of  
Consumer Protection and Economics of the  
Federal Trade Commission\***

**Submitted to the  
Food Safety and Inspection Service  
Department of Agriculture  
June 3, 1991**

**In Response to a  
Request for Public Comment on its  
Advance Notice of Proposed Rulemaking  
Regarding Nutrition Labeling of Meat and Poultry  
Docket No. 91-006N  
[56 FR 13564]**

**Policy Office, FSIS  
South Building, Room 3171  
U.S. Department of Agriculture  
Washington, D.C. 20250**

\* These comments represent the views of the staff of the Bureaus of Consumer Protection and Economics of the Federal Trade Commission. They do not necessarily represent the views of the Commission or any individual Commissioner. Inquiries concerning this document may be addressed to Pauline Ippolito (202-326-3477), Bureau of Economics, Federal Trade Commission, Washington, D.C. 20580.

## I. INTRODUCTION AND SUMMARY

The regulations governing food labels have been adopted over a course of decades, in part, to help Americans make better dietary choices. Yet, as reflected in the broad range of questions in the notice from the Department of Agriculture (USDA), there are many issues that arise in attempting to design the best policies to achieve this goal. Based on our experience in analyzing the effects of information in consumer product markets and in considering regulations that address information issues, the staffs of the Bureau of Consumer Protection and the Bureau of Economics of the Federal Trade Commission (FTC) offer the following comments to assist the USDA in its deliberations.<sup>1</sup>

The FTC is a law enforcement agency charged with prosecuting violations of Sections 5 and 12 of the Federal Trade Commission Act, which prohibit deceptive or unfair practices in or affecting commerce.<sup>2</sup> One of the FTC's major goals is to regulate national

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<sup>1</sup> These comments are the views of the staff of the Bureaus of Consumer Protection and Economics of the Federal Trade Commission. They do not necessarily represent the views of the Commission or any individual Commissioner. Inquiries concerning this document may be addressed to Pauline Ippolito (202-326-3477), Bureau of Economics. The staff of the FTC also provided comments to the Food and Drug Administration (FDA) in its rulemaking (Docket No. 89N-0226) regarding related issues for nonmeat food labels.

<sup>2</sup> 15 U.S.C. §§ 45 et seq. The FTC has jurisdiction over the advertising of food and has concurrent jurisdiction with the FDA and USDA over the labeling of food. The FTC also has statutory authority to enforce a number of laws that mandate disclosure, including the Federal Cigarette Labeling and Advertising Act, the Truth in Lending Act, and the Energy Policy and Conservation Act, which regulates appliance labeling, and to enforce several laws relating to standard-setting, including the Wool Products Labeling Act and the Magnuson-Moss Warranty & FTC Improvement Act. In addition, the FTC has promulgated disclosure  
(continued...)

advertising in a way that protects consumers from deception, but at the same time, minimizes the extent to which dissemination of truthful advertising is prevented or chilled. The staff of the FTC has developed considerable expertise in understanding the roles of advertising and labeling in providing consumers with information and in analyzing the value of required information disclosure or mandated product standards when the market otherwise fails to provide adequate information.<sup>3</sup> We recognize, however, that significant differences between claims on food labels and those in advertising may require somewhat different regulatory approaches.

Our analysis of the USDA's potential amendments to labeling regulations for meat and poultry products relies on the basic premise that consumers need two types of information to make

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<sup>2</sup>(...continued)  
rules, such as the R-Value Rule, which regulates thermal insulation labeling, the Used Car Rule, which requires warranty disclosures, and the Care Labeling Rule, which regulates clothing labeling.

<sup>3</sup> Relevant FTC staff research includes M. Frankena, M. Cohen, T. Daniel, L. Ehrlich, N. Greenspun & D. Keenan, Alcohol Advertising, Consumption, and Abuse, (1985); M. Lynch, R. Miller, C. Plott & W. Porter, Experimental Studies of Markets with Buyers Ignorant of Quality Before Purchase: When do 'Lemons' Drive out High Quality Products? (1986); P. Ippolito & A. Mathios, Health Claims in Advertising and Labeling: A Study of the Cereal Market (1989). The FTC staff explicitly examined issues involving identity standards in its Comments to the Food Safety and Inspection Service, USDA, on the Standard for Frankfurters and Similar Cooked Sausages, Docket No. 85-009E, 52 Fed. Reg. 2,416 (1987) (9 C.F.R. § 319.180 (1989)). In addition, the FTC staff developed expertise on the entry deterring effects of standards in connection with a proposed FTC rulemaking (J. Mooney, R. Schroeder, D. Graybill, W. Lovejoy, Standards and Certification: Proposed Rule and Staff Report (1978)).

but better dietary choices. First, they need information about how  
of diet is related to health and the importance of particular diet-  
he health issues. Second, once alerted to a particular diet-health  
issue, they also need information about how the characteristics  
of specific food products relate to that health issue. For  
n example, a consumer who understands that saturated fat is related  
to the risk of heart disease may benefit from required labeling  
e, of saturated fat. However, the same labeling is of little use to  
a consumer who is unaware of this relationship. We believe it is  
: important that the USDA is considering both types of diet  
information in revising its labeling regulations. Also, since  
ng scientific understanding of the relationship between diet and  
health continues to change, and since the range of food options  
is also changing, it is important that regulations provide  
mechanisms to deal with changes as they develop.

Our analysis of the proposed regulations governing meat and  
poultry labeling focuses on how these regulations affect the  
consumer's ability to make informed dietary choices in this  
changing environment. This analysis leads us to agree with the  
USDA approach, which avoids the potential for consumer confusion  
by not adopting different definitions for the standardized terms  
established by the Food and Drug Administration (FDA) (e.g., "low  
fat" or "low cholesterol"). We also agree with the USDA that it  
would be desirable to provide a mechanism to allow additional  
claims for meat and poultry products that are nutritionally  
attractive compared with other products in the category. Thus,

we support the USDA proposal to allow additional descriptors (e.g., "lean" or "extra lean") for meats and poultry.<sup>4</sup> Consumers can benefit from competition on fat content and other health dimensions within the meat and poultry category. However, the proposed FDA descriptors, by themselves, are unlikely to foster such competition. The tentative FDA thresholds for the "low fat" and "low cholesterol" descriptors are set at a level such that virtually no meat or poultry item could qualify if reasonable serving sizes are used.

If, like the FDA, the USDA adopts standardized definitions for a variety of descriptors, we think it is important that labels also be judged on the basis of whether they are likely to deceive consumers, since even standardized terms can be deceptive in certain instances. In addition, we recommend that the establishment of standardized terms not preclude the provision of

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<sup>4</sup> Both the USDA and the FDA use the term "descriptor" to refer to terms used on labels to highlight desirable nutritional characteristics of foods, often on the principal display panel of the package. In the regulations, descriptors are treated differently than "comparative claims," in which a comparison is made between substitutable products and in which explicit numerical information is given on the two compared products. For instance, "reduced fat" on the box would be treated as a "descriptor," but the claim "Brand X has 50 percent less fat than Brand Y; only 4 grams per serving compared to 8 grams per serving" is a comparative claim. Because of the amount of information required in comparative claims, they are generally less useful for prominent treatment on the principal display panel of the label.

Our comment focuses on the issues associated with the use of descriptors. The USDA also proposes to allow truthful comparative claims for products that have at least a 25 percent difference on the relevant dimension. We agree that comparative claims are also important for enhancing competition and for improving consumer information on the nutritional characteristics of foods.

other truthful and nonmisleading information on food labels.

Consumers Creative producer efforts to provide truthful information to consumers should be encouraged by labeling regulations as much as possible. Producers can be an important source of information to the public and can add variety and creativity to the standardized information provided in the nutrition label and in standardized descriptor terms.<sup>5</sup> Thus, if truthful, labels that discuss dietary recommendations, compare foods on multiple dimensions, or creatively depict desirable dietary characteristics of foods with graphics or illustrations can be a valuable addition to the flow of information coming from other sources.

We also support the USDA proposal to provide regulations to allow appropriate health claims on meat and poultry labels. Health claims that help to inform and remind consumers about relationships between diet and health can be useful to consumers in making their food choices. Obviously, it will be important to consider this area carefully to insure against deception, but we believe this can be accomplished without precluding the dissemination of truthful diet-health information.

Also we believe it is appropriate to allow products designed as an entire meal, such as frozen dinners, to provide nutrition information and to make truthful claims on a per-meal basis,

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<sup>5</sup> A recent FTC study of the ready-to-eat cereal market showed these effects to be substantial in spurring the development of better products and in improving consumption. See Pauline M. Ippolito and Alan D. Mathios, Health Claims in Advertising and Labeling, A Study of the Cereal Market, Bureau of Economics Staff Report, Federal Trade Commission, August 1989.

since this is how most consumers will use the product. Finally, we agree with the USDA that it may be useful to allow firms the option of also disclosing information on a metric basis on labels to facilitate international trade and competition.

## II. DESCRIPTORS AND RELATED ISSUES

Descriptors, such as "low calorie," "low sodium" or "light," have been used by many producers to highlight nutritional features of their products. If not used deceptively, such terms can serve as valuable signals for consumers trying to find products consistent with particular dietary goals. Under current regulations, use of such terms usually triggers nutritional labeling, which provides a means for consumers to compare the product on the dimensions of particular interest.

In the Nutrition Labeling and Education Act of 1990 (NLEA), Congress amended certain provisions of the Federal Food, Drug and Cosmetic Act (Pub. L 101-535, 104 Stat. 2353) to require the FDA to issue regulatory definitions for a number of descriptors used to characterize the level of nutrients on food labels, including "free," "low," "light" or "lite," "reduced," "less" or "high." In addition, the FDA has developed proposed definitions for fat and cholesterol descriptors.<sup>6</sup> For instance, under these

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<sup>6</sup> The tentative final rule for cholesterol descriptors was published on July 19, 1990 (55 Fed. Reg. 29456). There have been no formal proposals for fat descriptors, but interim working definitions have been given. For a description of these and other rules on FDA descriptors, see Committee on the Nutrition Components of Food Labeling, Nutrition Labeling, Issues and Directions for the 1990s, National Academy of Sciences, National Academy Press, Washington, D.C., 1990.

ally, definitions "low cholesterol" could be used only for foods with the 20 mg or less of cholesterol per serving and with less than 5 grams of fat and 2 grams of saturated fat per serving, and labels "reduced cholesterol" could be used only for foods with 75 percent less cholesterol than the comparison food. Under the ght," current working definitions at the FDA, the term "low fat" could be used only for foods with no more than 2 grams of fat per erms serving, and the term "reduced fat" could be used only for foods that have at least a 50 percent reduction in fat from the regular rrent product.

Table 1 gives nutritional data for a selection of meat and poultry products. This selection of items was chosen to illustrate the range of fat and cholesterol amounts characterizing common meat products. In particular, the table and illustrates that there is considerable variation in the fat and FDA cholesterol characteristics of meat products<sup>7</sup> and that consumers sed could substantially reduce fat and cholesterol in their diets by ng switching among such products. However, the table also illustrates that even with relatively small serving sizes t (approximately 3.5 ounces), the thresholds used in the FDA fat and cholesterol descriptor terms discussed above do not allow s virtually any meat or poultry product to differentiate itself as en lower in fat or cholesterol using descriptor terms. All meats

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1 <sup>7</sup> Throughout our comments, we will often use the term "meat" to refer to meats and poultry, that is, the items regulated by the USDA.

**Table 1. Nutritional Features of Selected Meat, Poultry & Fish Products**  
(Per 100 grams = 3.5 ounces, Separable Lean Only, Trimmed to 1/4" fat)

	Calories (kcal)	Total Fat (g)	Sat. Fat (g)	Stearic Acid (g)	Choles. (mg)
<b>BEEF (Good/Select)</b>					
Rib, broiled	206	10.4	4.2	1.4	77
Bottom Round, braised	196	6.8	2.3	0.7	96
Eye of Round, roasted	160	4.0	1.5	0.4	69
Top Round, broiled	169	3.7	1.3	0.4	84
Ground Beef, medium, pan-fried					
Regular	306	22.6	8.9	2.7	89
Lean	275	19.1	7.5	2.3	84
Extra Lean	255	16.4	6.5	1.9	81
Frankfurter	322	29.4	12.0	4.1	48
<b>PORK</b>					
Ham, roasted					
Cured (11% fat)	178	9.0	3.1	1.1	59
Extra lean (5% fat)	145	5.5	1.8	0.6	53
Loin, center, broiled	258	14.9	5.2	1.7	94
Loin, tenderloin, roasted	166	4.8	1.7	0.5	93
Bacon, fried (3 strips)	109	9.4	3.3	1.1	16
<b>CHICKEN</b>					
Light Meat					
Roasted, wo/skin	173	4.5	1.3	0.3	85
Roasted, w/skin	197	7.8	2.2	0.5	84
Fried, flour-coated w/skin	222	8.9	2.5	0.6	89
Dark Meat					
Roasted, wo/skin	205	9.7	2.7	0.6	93
Fried, flour-coated w/skin	254	14.4	3.9	1.0	94
Frankfurter	257	19.5	5.5	1.1	101
<b>FISH</b>					
Haddock, broiled	112	0.9	0.2	0.0	74
Haddock, breaded, fried	205	10.4	2.6	1.0	80
Shrimp, steamed	99	1.1	0.3	0.1	195

DATA. Nutrition data from Agricultural Handbook, Number 8, 1990.

NOTE. Under the proposed FDA definitions, the term "low cholesterol" could be used only for foods with less than 20 mg cholesterol, 5 grams of fat and 2 grams of saturated fat per serving. The term "low fat" would require the food to have less than 2 grams of fat per serving.

have cholesterol levels that are too high for the FDA standards and most meats have too much fat for the definitions.

These facts do not imply that the FDA definitions should be changed; the FDA presumably designed their definitions to deal with the broad range of nonmeat food products that they regulate. These facts simply illustrate the difficulties of standardizing definitions to apply to a wide range of circumstances, or in this case to a wide range of food items.

One option for the USDA would be to redefine the descriptor terms used by the FDA to reflect the dietary characteristics of meats. However, multiple definitions for the same standardized terms have the potential to mislead consumers, especially if consumers expect uniformity from terms regulated by the government. The USDA avoids this potential problem with its tentative position that it expects to adopt the same definitions for the standardized descriptors established by the FDA.

However, we believe it may be in the consumers' interest to allow additional descriptors for meat products beyond those currently envisioned by the FDA. As shown in Table 1, while none of the meat products would qualify as "low fat" or "low cholesterol" by FDA standards, there clearly are significant differences in fat and cholesterol content among poultry and meat products. Furthermore, meat and poultry are significant sources of fat in the American diet. In 1985, USDA food consumption survey data indicates that approximately one-third of the fat in the diet of adult women came from meat and poultry products, and

for men the percentage was even higher.<sup>8</sup> Moreover, more than 80 percent of women did not meet the dietary recommendation to consume only 30 percent of calories from fat; and 34 percent of women consumed in excess of 40 percent of calories from fat.<sup>9</sup> Clearly, if adults in the U. S. are going to meet the dietary recommendations for daily fat consumption, it would be desirable for them to be able to choose among meat and poultry products in order to reduce fat consumption.

An alternative way consumers can reduce the fat and cholesterol consumed from meat products is, of course, to reduce the amount of meat they consume. However, there are a number of problems with relying on this approach alone. Even if desirable from a dietary perspective, severe dietary changes are difficult for most people to sustain. Moreover, there are a number of important nutrients in meat products that are desirable for good health. For instance, in 1985 more than 80 percent of women of childbearing age were not meeting the Recommended Daily Allowance (RDA) for iron, and more than 50 percent were not getting even 70 percent of the RDA.<sup>10</sup> Because dietary iron deficiency can lead to anemia, both the Surgeon General's Report on Nutrition and Health and the National Research Council's Diet and Health

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<sup>8</sup> National Research Council, Designing Foods, Animal Product Options in the Marketplace, National Academy Press, Washington, D.C., 1988, pp. 27-28.

<sup>9</sup> ibid, pp. 48-49. No comparable data are given for men.

<sup>10</sup> ibid, p. 60.

n 80 recommend lean red meats as a good source of iron for women in  
this age group.<sup>11</sup>

of If consumers could easily find the lower fat meat products,  
they could more easily improve the types of meats consumed, which  
could have a substantial impact on the total fat in their diets.  
In this type of situation, where consumers may not be fully aware  
of the considerable variation among products, it is important to  
allow producers to compete on these quality dimensions.  
Competition creates pressures for all producers to improve their  
products and to inform consumers of desirable characteristics in  
ways that are easier for them to notice and understand.<sup>12</sup>

For these reasons, we believe that consumers would benefit  
if the USDA labeling regulations were to allow producers to  
convey the desirable nutritional features of their products in  
truthful and nondeceptive ways. USDA's tentative position to  
allow additional descriptors for meat products, such as "lean"  
and "extra lean," is one approach to fostering the provision of  
useful information. We believe that allowing additional

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<sup>11</sup> A similar recommendation is made for children and adolescents. See Surgeon General's Report on Nutrition and Health, U. S. Department of Health and Human Services, 1988, p. 16, and National Research Council, Diet and Health, National Academy of Sciences, 1989, p. 13.

<sup>12</sup> See Ippolito and Mathios, op. cit., for evidence of these effects in the ready-to-eat cereal market.

descriptors is an important element in the USDA's revisions of its labeling rules for meat and poultry products.<sup>13</sup>

If the USDA decides to adopt standardized descriptors for meat products, we believe that it is important that the USDA also retain the authority to reject label claims, even those using standardized descriptors, if the claims are deceptive in context. There are many situations in which the context of a claim is critical to meaning.

For example, suppose a condiment, such as a steak sauce or a substitute tartar sauce, contains fat but qualifies for a "low cholesterol" or "low fat" descriptor using the FDA mandated serving size of 1 or 2 tablespoons for such products. Suppose also that the label includes prominent treatment of a recipe for a main entree sauce using the condiment as the major ingredient, with an illustrated serving size of a half cup or more of the sauce. In this case, the amount of fat and cholesterol in the illustrated use of the product could be substantially greater than consumers might expect and substantially greater than in the standard serving size. Even though the product meets the legal definition of the terms, if the "low cholesterol" or "low fat" descriptors were used in the context of the recipe panel, there is a potential for consumer deception.

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<sup>13</sup> In choosing descriptors USDA can further avoid consumer confusion by using terms that are not readily confused with the FDA descriptors. The USDA might also consider requiring nutrition labeling whenever nutrition claims or descriptors are used for meat products that are not covered by the USDA's mandatory nutrition labeling rules.

s of           The problem of context is a serious concern in regulating  
advertising, where the context of the claims is often very  
for           important in determining the message to consumers. While less  
DA also       central to labeling issues, context can also affect the meaning  
ng           of labeling claims. Thus, we recommend that the USDA retain the  
ncontext.     authority to reject claims, including those using standardized  
s           descriptors, if in context they harm consumers by deceiving them  
about the nutritional characteristics of the food.

or a           Finally, if the USDA does adopt standardized definitions for  
ow           a variety of descriptors, we think it is also important that  
se           these standardized terms not preclude the provision of other  
for           truthful and nonmisleading information on food labels. Creative  
ent,          producer efforts to provide truthful information to consumers  
should be encouraged by labeling regulations as much as possible.  
Producers can be an important additional source of information to  
the public and can add variety and creativity to the standardized  
information provided in nutrition labels and in standardized  
descriptor terms. Some recent labels on frozen food dinners, in  
which overall dietary advice is described along with the  
product's contribution to each of the relevant dimensions are  
good examples of the types of creative producer efforts, which if  
done nondeceptively, can be a helpful complement to public  
education efforts.

### III. HEALTH CLAIMS

In its Advanced Notice of Proposed Rulemaking, the USDA  
states that it is considering a revision of its labeling policy,

which currently bans the use of health claims, to allow some health claims on meat product labels. Since no details are provided about the USDA's specific policy in this area, we cannot comment on the details of implementation. However, we do believe that amending USDA's rules to allow some health claims on food labels is desirable. Consumers are less likely to benefit from nutrition labeling if they do not know why particular nutrients are important. Truthful producer health claims can be an important complement to public education efforts on diet and health, helping to spread information about the relationships between diet and health and helping to remind consumers that a variety of foods can help them to improve their overall diets.<sup>14</sup>

#### IV. OTHER ISSUES

##### 1. Nutrition Information and Claims For Meal-Type Products

A "meal-type product" is any product that is packaged for use by one person, that contains ingredients from multiple food groups, and that is typically the main food item for a meal (commonly referred to as an entree). These products include frozen dinners, pot pies, pizza for one and similar items. The USDA proposes to list nutrition information for such products in their entirety, even if this deviates from standard serving sizes used for multiple-serve packages or for the components of the

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<sup>14</sup> For a detailed evaluation of the effects of allowing producer health claims in the cereal market, see Ippolito and Mathios, op. cit., which found that consumers increased their consumption of more healthful cereals, and producers were induced to provide better products, once competition was able to focus more directly on the health dimensions of cereal products.

meal. The USDA also proposes to allow special descriptors for meal-type packages, which are different from those used for individual food items. We agree that treating meal-type packages as units for the purposes of both labeling and claims will probably provide the best information for consumers.

In judging the appropriate basis for nutrition information, there are two issues that must be weighed: the usefulness of the measure in giving consumers nutrition information about what they will actually consume from a product, and the usefulness of the measure in allowing consumers to compare nutrient values across different food products. In the case of meal-type products, most consumers will consume the entire contents of the food product.<sup>14</sup> Thus, describing the nutrition profile of the entire package is likely to be the best measure of what the consumer will actually eat. Moreover, if a consumer is purchasing a meal-type product, it is likely that he will be choosing among similar products, and this measure will also provide good comparative information. Only in cases where the consumer is considering a meal-type product as a replacement for a meal prepared from individual food items will the per-meal information be less useful for comparison than individualized information.<sup>15</sup>

Similarly, to require meal-type products to use only the descriptors designed for use on individual food items would limit

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<sup>15</sup> However, even here, the consumer simply has to add up the nutrition from the component items in the meal to get a reasonable comparison of what will be consumed from the two choices.

producers' ability to highlight accurately the desirable nutrition characteristics of meal-type products. Most consumers eat 3 or 4 food items in a meal, and the thresholds used to define the FDA descriptors were chosen accordingly. If a meal-type product, such as a frozen dinner, is not allowed to use other descriptors, a product that would have met the standards for each of the components of the meal separately will not be able to highlight that fact easily for consumers: when the individual food items in the meal are added together, the total fat content would no longer meet the threshold. This does not help consumers who use these products. The problem can be remedied easily by allowing meal-type products to use descriptors that are reasonable for meals taken as a whole (e.g., by allowing descriptors such as "low fat meal").

For these reasons, we believe that the tentative USDA position, which states that labeling regulations will treat meal-type products as a separate category, is appropriate: providing nutrition information for the entire meal and allowing different descriptors for such products is likely to provide better information to consumers who use such products.

## 2. Units of Measure

The USDA states in its advanced notice of proposed rulemaking that it will adopt ounces as the unit of measure for meat and poultry products, but will also allow optional use of metric weights (grams) to facilitate international trade. We agree with this position.

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Pounds and ounces are the units of weight measure most familiar to the U. S. consumer. However, international trade of packaged consumer products is becoming more important to American producers. As much as possible, labeling regulations should adopt flexibility towards multiple declarations to ease producers' ability to operate in multi-national markets. At a minimum, allowing producers to adopt dual labeling of products (for example, in both ounces and metric measures, or in both weight and volume measures) does not appear to impose substantial costs on the U. S. consumer and this flexibility may be enough to allow firms to design a single label for products traded in some other countries.<sup>16</sup>

#### V. CONCLUSION

Our analysis of the proposed regulations governing the labeling of meat and poultry products leads us to agree that the USDA avoids the potential for consumer confusion by not adopting different definitions for the standardized descriptors defined by the FDA. However, because the FDA descriptors would not facilitate competition among meat products, it is important that the USDA also allow the use of other truthful and nonmisleading claims for meat products. Our evaluation also supports the USDA's plan to remove its ban on the use of health claims on meat

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<sup>16</sup> For instance, Canada requires producers of jams and jellies to label their products by volume, but U. S. regulations require labeling by weight. Allowing a firm to label the product in both ways (e.g., 16 ounces, 250 ml) could eliminate the need for distinct labels for each country. Similarly, meat producers could be allowed to label in both ounces and grams to meet the requirement in both countries.

labels. We also support treating meal-type products as units for purposes of nutrition claims and labeling. Finally, we believe it appropriate to allow enough flexibility in labeling to permit dual declarations of measures on labels to facilitate international trade of packaged consumer products.