



Nutrition for Family Living

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March, 2007 Topics

Sorting Food Label Claims

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Sorting Food Label Claims

By Susan Nitzke

Food labels typically contain several types of information including the name of the product, the amount in the package, the manufacturer's address, the ingredient list, the Nutrition Facts panel with information on calories and nutrients per serving and per package, and one or more statements telling about that product's special health benefits. There are several types of label claims: nutrient content claims, dietary guidance, structure/function claims and health claims.

Label claims have generated a lot of confusion among consumers, especially since some manufacturers have been pushing the limits beyond what is officially allowed. To help clarify the purpose and rules for label claims, the FDA recently published a letter and posted it on their website. Following are highlights of that letter:

Nutrient content claims describe the level of a nutrient in a food using terms such as *free*, *high* and *low*, or they compare the level of a nutrient in a food to that of another food, using terms such as *more*, *reduced* and *lite*. Nutrient content claims usually only apply to those nutrients or substances that have an established Daily Value (DV). FDA defines the term *Healthy* as an implied nutrient content claim. To use the term *Healthy* on a food label, the product must be within official limits for total fat, saturated fat, cholesterol, other nutrients and sodium.

Sometimes companies submit a nutrient content claim petition to the FDA asking for authorization and review of scientific evidence. More often, FDA prohibits or modifies a nutrient content claim within 120 days after it has received a nutrient content claim notification. The rule allowing use of a claim during that 120 period has opened the door for some fairly questionable statements that have been appearing on food labels in the past few years.

Dietary guidance statements focus on general dietary patterns, practices and recommendations that promote health. Typically 'dietary guidance' statements refer to a category of foods and not a specific substance or ingredient. An example of a dietary guidance statement is: "*Carrots are good for your health.*" As long as they're true and not misleading, dietary guidance statements can be made without FDA review or authorization.

Health claims describe the relationship between a food or ingredient and a disease or health-related condition. These statements are limited to claims about disease risk reduction, and cannot be claims about the cure. An example of a health claim is "*Diets low in sodium may reduce the risk of high blood pressure, a disease associated with many factors.*"

FDA regulates health claims in one of three ways: it issues a regulation authorizing a health claim that meets the significant scientific agreement standard set forth in the 1990 Nutrition Labeling and Education Act; it prohibits or modifies a health claim within 120 days after it has received a health claim notification; or it issues a letter of enforcement discretion for qualified health claims.



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Structure/function claims describe the role of substances intended to affect or maintain the normal structure or function in humans, for example, "*calcium builds strong bones*" and "*fiber maintains bowel regularity.*" Structure/function claims can be made without FDA review or authorization before use, but they must be truthful and not misleading and the claims must derive from the nutritional value of the product.

Implications for Extension Educators: The rules covering food labels are complex and potentially confusing to consumers. For most purposes, the most reliable and tightly controlled information for consumers are the **Nutrition Facts** panel and **Ingredients** list.

References and related resources:

FDA's Dear Manufacturer Letter regarding food labeling, 1/30/07

<http://www.cfsan.fda.gov/~dms/flguid.html>

FDA's brochure on the Nutrition Facts panel

<http://www.cfsan.fda.gov/~acrobat/nutfacts.pdf>

FDA's "Test Your Food Label Knowledge" quiz

<http://www.cfsan.fda.gov/~dms/flquiz1.html>

NUTRITION: To know the facts... use the label section of the "Finding Your Way to a Healthier You" consumer booklet on the Dietary Guidelines for Americans

<http://www.health.gov/dietaryguidelines/dga2005/document/html/brochure.htm#b6>

"Keeping Up with the Changing Food Label" article from the International Food Information Council, 2006. <http://www.ific.org/foodinsight/2006/jf/foodlabelfi106.cfm>

Colorado State University Cooperative Extension publication on "The New Food Label" (NOTE: contains out of date references to the 2000 Dietary Guidelines and Pyramid)

<http://www.ext.colostate.edu/pubs/foodnut/09365.html>



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Using the Publication *Small Steps to Health and Wealth* in Family Living Programs

By Gayle Coleman and Gayle Rose Martinez

Small Steps to Health and Wealth describes similarities between strategies used to change personal health behaviors and strategies used to change personal finance behaviors. The authors of this publication encourage individuals to make small, manageable behavior changes to achieve their personal health and financial goals. They offer a variety of sample behavior changes within 25 general strategies.

The publication is targeted to the general population in the United States and frequently uses examples that might not be realistic or appropriate for low-income families. For example, an illustration of how to use financial frames of reference is based on a \$50,000 annual income, and one health suggestion is to use exercise equipment with a display showing calories burned.

The “Health” part of the guidebook is focused on weight loss, using a “calorie accounting” approach to weight management. While most U.S. adults do weigh more than is good for health, this approach doesn’t leave much room for relating to adults who are at a healthy weight but could still set goals for improved nutrition. Family Living Educators are encouraged to include a broader view that is consistent with MyPyramid messages like “Focus on Fruit” and “Vary Your Veggies” as well as “Find your balance between food and physical activity.”

The *Small Steps* publication includes some concepts that are consistent with familiar teaching materials like those from “Stepping Up to a Healthy Lifestyle” <http://www.nutrisci.wisc.edu/nutrinet/WDPmaterials.html>. For example, the “step down to change” strategies provide examples for realistic “steps” to improved behavior – switching from a super-sized soft drink to a medium-sized soft drink, then to a diet soft drink and finally to water.

Many of the suggestions in the “Financial” part of the book are large steps rather than the “small steps” approach suggested. Two examples are strategy #1 “Track Your Current Behavior” which asks individuals to track everything for one or two months or strategy #2 “Unload Your Childhood Baggage” which suggests that individuals understand and release family messages. These are great ideas but each of these examples might require a huge shift in behavior with many smaller steps leading to the change.

The *Small Steps* publication also includes many concepts that are consistent with current teaching tools found in our Volunteer Financial Counseling Training Materials and our tool box resources. For Example, the Strategy #4, “Commit to Making a Change” is aligned with Smart Goals and other goal-setting techniques we already use. Family Living educators are encouraged to continue to meet their customers where they are at and make suggestions that encourage a successful outcome – strategies that help build confidence and self esteem.

This publication may be of interest to Family Living and WNEP staff personally and might spark program ideas, but it is important to note that most of the personal finance content in this publication is out of scope for Food Stamp Nutrition Education. In addition, the health part of this publication is narrowly focused on strategies for weight loss, and many of the nutrition examples are not realistic or appropriate for some of our audiences, including low-income families.

O-Neil B, Ensle K. *Small Steps to Health and Wealth*. Natural Resource, Agriculture, and Engineering Service, Cooperative Extension. 2006.