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Food Labels-- Do They Tell Enough ?



A Summary Of A Report To The Congress On Food Labeling: Goals, Shortcomings, And Proposed Changes

Department of Health, Education,
and Welfare
Department of Agriculture
Department of Commerce

*BY THE COMPTROLLER GENERAL
OF THE UNITED STATES*

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INTRODUCTION

The Fair Packaging and Labeling Act states that

- informed consumers are essential to the fair and efficient functioning of a free market economy and
- food packages and their labels should tell consumers clearly what the contents are and help them compare values.

The General Accounting Office (GAO) wanted to know how well the Government had carried out the Fair Packaging and Labeling Act and related food packaging and labeling laws to

- promote honest and fair dealings with consumers and
- insure that packages and labels provide information to help consumers compare products and determine which best provide for their specific needs or desires

GAO also appraised the probable effect of proposed changes in these laws on industry and consumers.

Although most food products comply with Federal packaging and labeling laws and regulations, improvements are needed so that labels tell consumers what they need to know to compare and select those products suited best to their needs or wants.

Several bills were introduced in the 93d Congress to amend the Fair Packaging and Labeling Act and related food labeling laws to require food labels to include information concerning

- identity of ingredients,
- nutrient values,
- percentage of main (or characterizing) ingredients,

- quality grades of characterizing ingredients,
- product freshness, and
- unit pricing (the price per standard measure, such as price per ounce, pound, pint, etc.).

Each consumer gives different weights in the buying decision to quality, price, and taste of the food product, but the ability to compare these factors (or the lack of it) affects the ability of consumers to select the products most suited to their specific needs or preferences.

NEED FOR FULL DISCLOSURE OF INGREDIENTS

Consumers' ability to compare competing food products depends in part on their ability to identify the specific ingredients used in each product.

The Federal Food, Drug, and Cosmetic Act requires that most food products have their ingredients listed on their labels. In accordance with the Federal Food, Drug, and Cosmetic Act, however, the Food and Drug Administration (FDA) has established standards of identity specifying mandatory and optional ingredients for 284 food product categories. These "standardized" food products are exempt from having some of their ingredients listed.

In addition, the Food, Drug, and Cosmetic Act permits food manufacturers to list spices, flavorings, and colorings in general terms rather than by specific name. FDA also permits food manufacturers to list vegetable oils in general terms.

As a result, products exempted or permitted to have a generalized ingredient listing may not provide consumers--especially those on special diets because of illness, allergies, or other reasons--the information needed to choose those products

best suited to their specific needs or preferences.
For example:

- Approximately 23 million people with heart conditions should avoid saturated fats, sodium, and caffeine.
- Over 4 million diabetics and kidney patients must avoid or restrict their intake of sugar or potassium, respectively, and both should restrict their intake of sodium.
- Over 7 million people suffer from allergy reactions to milk, eggs, gluten, wheat, corn, tartrazine (a food coloring), nuts, and monosodium glutamate.

GAO's review of 284 food categories exempt from listing some of their ingredients showed that at least 1 of 10 ingredients avoided by consumers on special diets was an optional ingredient in 127 food categories and was not required to be listed on the label. The 10 ingredients were caffeine, eggs, gluten, milk, monosodium glutamate, nuts, sodium, sugar, tartrazine, and wheat.

GAO randomly selected 1,000 food products from Detroit area supermarkets and found that labels for 129 disclosed none or only some of their ingredients. Also 64 percent listed spices, flavorings, colorings, and vegetable oils in general terms. Use of general terms for such ingredients can create a potential hazard for consumers with health problems.

Recommendation:

The Secretary of Health, Education, and Welfare (HEW) should direct the Commissioner, FDA, to issue regulations requiring labels of food products to identify the specific vegetable oils used.

The Congress should consider amending the Fair Packaging and Labeling Act or the Federal Food, Drug, and Cosmetic Act to require full disclosure of all ingredients on packaged food products, including "standardized" products; and authorize FDA to require food labels to specifically identify spices, flavorings, and colorings where a proven need exists.

Agency comments

HEW agrees with GAO's recommendations.

HEW said that, based in part on comments on a June 1971 proposal by FDA to require specific identification of fats and oils on food labels, FDA terminated that proposal and published a similar proposal on June 14, 1974.

The Department of Agriculture (USDA) also supports GAO's recommendation for specific identification of vegetable oils in shortenings and in meat and poultry products. USDA pointed out, however, that identification as animal fat or vegetable oil may be sufficient in certain meat and poultry products which use such small amounts of vegetable oil that their contribution to cholesterol intake would be insignificant.

HEW and USDA agree with GAO's recommendation to the Congress concerning disclosing all ingredients and identifying spices, flavorings, and colorings.

HEW said its legislative proposal (S. 1451 and H.R. 5642) would amend the Federal Food, Drug, and Cosmetic Act to require disclosure of all ingredients by placing standardized foods under the same legal requirements that apply to nonstandardized foods. In addition, HEW said it supports most aspects of a bill (S. 2373) passed by the Senate which addresses the issue of food ingredient labeling.

USDA told GAO it requires disclosure of all ingredients in both standardized and nonstandardized meat and poultry products, except for vegetable oils, spices, flavorings, and colorings. USDA also supports specific identification of spices, flavorings, and colorings where a proven need exists, and has the authority to require it.

NUTRITIONAL LABELING

Many Americans suffer dietary and health problems due, in part, to the lack of good nutrition. A USDA study showed that only 50 percent of the household diets it reviewed met the "recommended daily allowance" for seven nutrients tested. Deficient diets are caused frequently by poor food choices resulting, to some extent, from lack of nutritional information on food labels and the lack of education in nutrition.

Although existing evidence is inadequate for estimating the potential health benefits from improved diets, nutritionists believe that improved diets help prevent diseases or reduce their impact. For example, osteoporosis (a bone disease) is associated with diet deficiencies in calcium, phosphate, vitamin D, fluoride, and possibly magnesium.

FDA began a program in March 1973, requiring detailed nutritional information on the labels of foods that are fortified or for which nutritional claims are made and encouraging manufacturers of other foods to voluntarily include nutrient information on their labels.

In March 1974 GAO's retail shelf survey of labels on 252 food products showed that 48 percent had the nutritional information in the format prescribed by FDA.

An education program is needed to explain to consumers the purpose and best use of nutritional labeling and to help them understand the new FDA labeling format.

For example, a can of green beans had this information on its label before the regulations.

Size of Can... No. 303 / Net Wt... 1 lb. / Cups... Approx. 2

Tender, young Blue Lake green beans, carefully selected for quality and sliced lengthwise to bring out the full delicate flavor of the beans.

SUGGESTIONS FOR SERVING

Pour liquid into saucepan and boil rapidly down to one-half volume; add beans and heat quickly. Do not overcook. If desired, season with salt, pepper, butter or crisply cooked bacon bits. Add minced dill pickle or onion for a zippy flavor. Or serve with a sauce such as: horseradish, mustard, sour cream, tomato.

Nutritional information is available on request

The label for the same can of green beans now includes this information.

Net Weight	16 oz. (1 lb.)
Metric Weight	454 grams
Cups	Approx. 2

INGREDIENTS GREEN BEANS WATER SALT

NUTRITION INFORMATION - PER ONE CUP SERVING
SERVINGS PER CONTAINER APPROX 2

CALORIES	40	CARBOHYDRATE	8gm
PROTEIN	2gm	FAT	0gm

PERCENTAGE OF U.S. RECOMMENDED DAILY ALLOWANCES U.S. RDA PER ONE CUP SERVING

PROTEIN	2
VITAMIN A	25
VITAMIN C	10
THIAMIN B ₁	4
RIBOFLAVIN B ₂	6
NIACIN	2
CALCIUM	6
IRON	8
PHOSPHORUS	4
MAGNESIUM	6

For good nutrition eat a variety of foods.

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Although FDA began implementing its program in March 1973, it did not initiate its multimedia consumer education program to explain the nutritional labeling format to consumers until May 30, 1974. Moreover, no money was provided to have the radio and television presentations at a time when most consumers are listening or watching. Instead FDA is relying on public service announcements frequently made on non-prime time slots on radio and television.

Recommendation

The Secretary of HEW should direct the Commissioner, FDA, to monitor the effectiveness of relying on public service announcements to present FDA's consumer education program, and, if appropriate, develop more effective means of presenting the information to consumers.

Agency comments

HEW and USDA agreed with GAO's recommendations.

HEW said FDA is acting to measure the effectiveness of its entire nutritional education campaign. In June 1974, FDA awarded a contract for a followup to an earlier survey to measure the status of consumer nutritional knowledge. This followup survey is to include an evaluation of the effectiveness of the multimedia campaign and should help FDA develop more effective means of presenting nutritional information to consumers.

HEW pointed out that FDA's consumer education campaign involves a substantial degree of direct contact with nutritionists, educators, trade associations, consumer organizations, media sources, and other specialists who influence many routes of communication with consumers. HEW expects all these efforts to have a substantial multiplier effect when these specialists in turn communicate nutritional information to consumers.

USDA is participating with FDA in the consumer nutritional education program. USDA has been approving nutritional labels on the basis of a proposal published in the Federal Register on January 11, 1974. As of September 1974, USDA had approved approximately 400 labels for 60 companies. In addition, USDA has developed materials it plans to release early in 1975 which will help consumers get the most from the new information on food labels.

NEED FOR PERCENTAGE OF CHARACTERIZING INGREDIENTS ON LABELS

Labels on food products frequently lack information concerning the amount of characterizing ingredients in the product--that is, the amount of beef in beef stew, apples in apple pie, or pears in canned pears.

As a result, manufacturers can and do vary the percentage of characterizing ingredients and thus vary the value or acceptability of their product without consumers' knowledge. Without this information consumers cannot readily make a value comparison between competing products as the Fair Packaging and Labeling Act intended.

GAO reviewed recipes for 57 products in 21 meat and other food categories and found that the percentage of ingredients varied. For example, beef in beef stew varied by as much as 22 percent between brands.

One manufacturer's frozen fruit pies contained 47 percent fruit, while its competitor's products contained 65 percent fruit in apple pie and 54 percent fruit in cherry pie. Officials of the firm reporting 47 percent fruit opposed percentage labeling because it would not permit them to vary product contents without changing labels.

In addition, the amount of juice or liquid packing medium varies from product to product. An October 1972 article in Consumer Reports showed

significant differences in the drained weight of canned foods and that the variances were not always related to the retail prices.

Few products state the percentage of characterizing ingredients on their labels. CAC's examination of 317 randomly selected products which had characterizing ingredients showed that only 4.1 percent of the labels stated an amount or percentage of characterizing ingredients.

FDA, in March 1973, established regulations requiring the labels of some food products to show the percentage of each characterizing ingredient. The Commissioner of FDA concluded that

- percentage labeling should be used when this information may have a material bearing on price or consumer acceptance of a food or when such information may prevent deception and
- percentage labeling often is necessary for consumers to choose between two competing products.

FDA required percentage labeling on two specific products--diluted orange juice and seafood cocktail.

The regulations provide for interested parties to petition FDA to have products bear percentage labeling. However, as of March 1974 only one petition had been submitted.

FDA officials said they did not believe a review of the percentages of ingredients in all foods was warranted or worth the expense.

Although percentage labeling may not be appropriate for all products, little has been done to judge the practicality and need for percentage labeling on an individual product basis.

If FDA continues to rely on petitions by interested parties to identify products appropriate

for percentage of characterizing ingredient labeling, it appears to GAO that few products will be labeled this way.

Recommendations

The Secretary of HEW should direct the Commissioner, FDA, to identify foods that would be appropriate for percentage of characterizing ingredient labeling and require such foods to include this information on their labels.

Agency comments

HEW and USDA agreed with GAO's recommendation.

HEW said that FDA, to the extent resources permit, is identifying foods appropriate for percentage of characterizing ingredient labeling and requiring their labels to include percentage information.

HEW said that, after FDA had issued the regulations for seafood cocktail and diluted orange juice beverages, FDA had issued a final regulation for beverages with no fruit or vegetable juice and had proposed regulations for oil mixtures with olive oil and for diluted fruit or vegetable juice beverages.

USDA said it recently published guidelines preparatory to proposing regulations. USDA believes percentage labeling will help consumers make value comparisons or otherwise help them determine which product best meets their needs.

Although USDA believes percentage labeling should be voluntary, it plans a study to determine whether percentage labeling of certain classes of foods should be mandatory.

QUALITY GRADING--HELP OR HANDICAP?

Many consumers can't compare the value of competing products without opening the container because

Labels generally don't bear information or grades concerning the quality--that is, color, size, texture, flavor, blemishes or defects, and consistency.

USDA has suggested that consumers use its quality grading system to compare competing products. The USDA grading system, however, was intended for use at the wholesale and manufacturer level, and it can present problems to consumers trying to use it.

A USDA study reported that most consumers knew little about the USDA system. They could not identify correctly the Government grades of the products they purchased. The several sets of grade names and designations tend to confuse consumers. The following chart shows 10 different top quality grade designations used by USDA for different food categories.

Apple juice, canned	U.S. grade A or U.S. Fancy
Apples, fresh	U.S. Extra Fancy
Beef	USDA Prime
Beets, fresh	U.S. No. 1
Cantaloups, fresh	U.S. Fancy
Carrots, fresh	U.S. grade A
Celery, fresh	U.S. Extra No. 1
Eggs	U.S. grade AA
Peanuts, Virginia in shell	U.S. Jumbo Hand Picked
Peanuts, Virginia Shelled	U.S. Extra Large

Added confusion results when trying to compare the grades of similar types of products. The top grade for fresh pears, for example, is U.S. No. 1, but U.S. No 1 fresh apples are only the third best grade, as shown below.

<u>Quality</u>	<u>Fresh apples</u>	<u>Fresh pears (note a)</u>
1st	U.S. Extra Fancy	U.S. No. 1
2d	U.S. Fancy	U.S. Combination
3d	U.S. No. 1	U.S. No. 2

^aThere are two U.S. grade standards for fresh pears. We have used the standard for summer and fall pears.

Several bills were introduced in the 93d Congress to establish uniform, easy-to-understand nomenclature for a quality grading system for all foods.

A USDA official said the current cost of voluntarily grading less than 100 percent of only six categories of food products was about \$183 million annually. But, if grading became mandatory, the cost of grading all food products in these same six categories would increase by about \$327 million to a total of about \$510 million annually. If all food products were graded the costs would be significantly greater.

As for existing USDA standards, he said that problems and costs of revising them have hampered USDA's efforts to make them easier for consumers to use.

GAO believes that, although establishing and enforcing a mandatory grading system for all foods could be very costly, revising existing grade designations to make them uniform and easy to understand could assist consumers greatly in using the USDA system.

Recommendation

The Secretary of Agriculture should revise existing regulations to make grade designations uniform and easier for consumers and industry to understand.

Agency comments

USDA supports the goal of reducing consumer confusion regarding grade designations but, because of the number of quality variables among food products, does not believe it is possible to develop one system of grade designations to cover all products. It suggests that a practical goal may be uniform grade names within groups of similar products, such as fresh meats, poultry, or processed fruits.

USDA is studying uniform grade designations for fresh fruits and vegetables. It has already established uniform grade standards for some 150 processed food products based upon a simple A, B, C system.

USDA opposes a mandatory system for grading all food products or for grading the main characterizing ingredients. Citing practical problems in implementing such a program and the high cost, USDA concluded the costs likely would far outweigh any benefits to consumers.

NEED FOR UNIFORM OPEN DATING SYSTEM

Freshness is obviously important in comparing perishable and semiperishable food products. After a few days some foods begin to lose their color, taste, and nutrient values. This period is called shelf life.

Food manufacturers for years have dated their products for their inventory control and to help retailers rotate stock on the shelves, but this information was usually coded and was of no use to consumers. Uncoded dating information is commonly referred to as open dating.

Most food products are properly rotated by retailers, but consumers purchase some spoiled or stale food without being aware of it. A study in Dade County (Metropolitan Miami), Florida, of supermarket inventories before and after open dating was introduced there in 1971 showed about 5 percent of the supermarket inventory of perishable products were still on the shelves past the prescribed last day of sale. A study by USDA in Ohio showed that over 20 percent of the shoppers interviewed reported purchasing stale food.

In an unusual case, one consumer wrote FDA that she had purchased a frozen turkey roast in December 1972 with a coupon for a meat thermometer enclosed. The coupon, however, expired on June 30, 1971--18 months earlier. Was the coupon date erroneous? Was the roast actually 18 or more

months old (twice the recommended shelf life)?
The consumer had no way to know.

Many food store chains voluntarily, or as required by State or local law, have begun providing consumers open dating on many of their perishable and semiperishable products. However, the variety of dates ("pull date," "packed date," "expiration date," etc.) used in open dating systems and the general misunderstanding of the meaning of the open dates have resulted in limited consumer use of the dates.

A 1971 USDA study of a Chicago grocery chain's food dating program showed that 63 percent of the 429 shoppers interviewed had used open dating at least once; however, 45 percent believed the date was either the date manufactured, packaged, delivered, or put on display--a past date. Only 20 percent of these shoppers knew that the open date was in fact a future date--the last date the product should be sold!

Recommendation

The Congress should consider enacting legislation to establish a uniform open dating system for perishable and semiperishable foods.

Agency comments

HEW, USDA, and Commerce generally favor establishing a uniform, easy to understand system of open dating for perishable and semiperishable foods. There is some disagreement, however, on which procedure would get the best results.

HEW said that FDA

- has authority to require open dating in any case where its absence may result in a food being adulterated;
- would not object, however, to explicit statutory authority, by amendment to food

labeling laws, to establish a uniform open dating system; and

--supports the provisions of a bill (S. 2373) as passed by the Senate on July 11, 1973, which provides authority for FDA to issue regulations requiring sell or use dates and storage instructions to be shown on food labels.

USDA supports voluntary open dating of meat and poultry products and has published regulations which were to go into effect on December 8, 1974. These regulations will require that if an open date is used, it must be clearly designated as a "packing," "sell by," or "use before" date.

USDA plans to monitor the voluntary program to determine if changes are necessary or if it should be made mandatory. USDA said the voluntary approach is best so consumers, industry, and Government can gain necessary experience before making additional judgments.

Generally, Commerce agrees that a uniform system of open dating for perishable and semiperishable foods is desirable. However, Commerce said that not enough is known to legislate open dating; therefore, a fully flexible system should be tested to determine the best method for open dating. Such a flexible system, stated Commerce, can be achieved by revising the Model State Open Dating Regulation.

GAO believes that to wait for additional experience with open dating either through a voluntary program or by modifying the Model State Open Dating Regulation would only prolong the confusion consumers are experiencing. It would also tend to add to the confusion as attempts to use open dating grow because each manufacturer, retailer, or State would continue to choose its own open dating system.

UNIT PRICING--OLD IDEA,
NEW APPLICATION

Despite the Fair Packaging and Labeling Act program to reduce the number of package sizes, consumers still find it difficult to make accurate price comparisons. Studies show that consumers trying to select the lowest priced product make inaccurate selections at least 40 percent of the time.

Unit pricing--providing the price per standard weight or measure--helps consumers to compare prices without having to make complicated mathematical calculations. Although unit pricing does not consider differences in the quality of competing products, studies have shown it can--if presented effectively--significantly reduce price comparison errors by consumers.

For example, the average percentage of correct choices (the package which gave the most quantity for the least money) was 25 percent higher when unit pricing was provided and the average shopping time was significantly less, one study showed.

Although unit pricing is available in about 50 percent of the chain-operated supermarkets and in 25 percent of the independent supermarkets, retailers have not always presented unit pricing in a manner that is readily usable and easily understandable.

Money magazine proposed a model shelf label (see below) which GAO believes does a good job of displaying the essential data legibly.

Del Monte sliced pears	24 cans 1997¢
Weight	Package Price
25.79 per lb.	52¢ per 29-oz. can

G-Model label from Money magazine.

Variations in the number of products covered by individual stores or chains, problems in the design and maintenance of shelf labels, inappropriate units of measure, and lack of promotion and explanatory materials have all contributed to problems consumers have in understanding and using unit pricing.

UNIT PRICING--IMPACT ON CONSUMER AND RETAILER

Surveys of consumers' use of unit pricing showed a considerable range (9 to 68) in the percentage of shoppers claiming any use of unit pricing, and the average was only 34 percent.

One main reason for this limited use has been the lack of awareness and understanding of unit pricing. For example, one study showed that 28 percent of those not using unit pricing were not aware of it.

Estimates show the annual cost to the food industry of providing unit pricing for the majority of consumers could be as high as \$133.8 million. This cost would have to be passed on to consumers in the form of higher prices.

The estimated increase in food prices from unit pricing would be about \$5.71 a year, or 11 cents a week for a family of four. This estimate is based on the 1973 annual cost of food estimated by USDA and the 0.17 percent of sales cost estimate found in studies of unit pricing systems in operation.

Although few consumer studies of dollar savings from unit pricing have been made, one survey showed that about 8.8 percent of the purchases observed probably involved the use of unit pricing and another study concluded that participants had actually saved about 3 percent of the purchase price through the use of unit pricing. This is 0.264 percent of the cost of all purchases and

indicates that consumers, by using unit pricing, can offset the cost of providing it.

Recommendation

The Congress should consider enacting legislation to establish a unit pricing program, including guidelines for the design and maintenance of unit pricing information and the education of consumers about its use and benefits.

Agency comments

HEW's Office of Consumer Affairs endorses the concept of uniformity of unit pricing as well as education of consumers as to its uses and benefits.

USDA noted that with unit pricing consumers could more readily make both price-quantity and price-quality judgments.

Commerce disagreed with GAO's recommendation. Commerce believes that various surveys cited in GAO's report indicate that consumers would not offset the costs of a mandatory program by using unit pricing to select lower unit cost products. Also Commerce stated that mandatory unit pricing would require Government monitoring and, in this period of rapid inflation, it seemed inadvisable to endorse any program that would unnecessarily add to the cost of food and/or increase the cost of government when the benefits in so doing are doubtful.

Also Commerce believes the existence of at least one chain with unit pricing in any area provides the consumer with the option to use it and that free market pressure should be sufficient to persuade other chains to adopt unit pricing so as to remain competitive and, therefore, there is no need for Government to intervene where the market operates efficiently.

Concerning whether consumers would use unit pricing provided under a mandatory program, one main reason for the limited use of unit pricing has been the lack of awareness and understanding.

Problems and variations in the extent of coverage, the design and maintenance of shelf labels, the unit of measure, and the lack of promotion and explanatory materials have all contributed to the problems consumers have in trying to understand and use unit pricing. A mandatory uniform program should reduce the obstacles limiting consumer awareness and understanding of unit pricing.

Also studies cited in this report indicate that, when consumers use unit pricing, they can save enough to more than offset the cost of providing unit pricing.

We believe it becomes even more important during a period of rapid inflation to have unit pricing to help consumers compare the cost of competing food products.

With regard to the cost of monitoring unit pricing requirements, the experience of the few State and local governments enforcing unit pricing regulations indicates that unit pricing adds little to the taxpayers' burden. Officials of six of the eight State and local governments regulating unit pricing stated that active enforcement programs are being carried out with existing personnel.

Unit pricing is available in about 50 percent of the chain-operated supermarkets and in 25 percent of the independent supermarkets.

But variations in the number of products covered by individual stores or chains, problems in the design and maintenance of shelf labels, inappropriate units of measure, and lack of promotion and explanatory materials have all contributed to problems consumers have in understanding and using unit pricing. Unit pricing programs with such problems should not be expected to develop sufficient market pressure to persuade other chains

to adopt unit pricing to remain competitive. Further, in an area where no retailer is providing unit pricing, there is no such market pressure for a retailer to adopt unit pricing.

COMMENTS OF CONSUMER AND
INDUSTRY REPRESENTATIVES

Officials from 22 food manufacturing and retail firms, 4 food manufacturer and retailer trade associations, and 5 consumer groups were interviewed.

Although in many instances both consumer and industry representatives stated that consumers needed more information to readily make value comparisons as intended by the Fair Packaging and Labeling Act, they often disagreed on how such information should be presented and on how it should be controlled to insure that consumers received the maximum benefits.

Basically, industry and consumer representatives differed on whether any change in food labeling requirements is justified and on the impact of the change on food prices.

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