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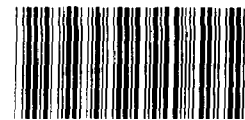
General Accounting Office

Informing The Public About Food--A Strategy Is Needed For Improving Communication

Consumers have difficulty deciding what foods to buy because of the vast selection of food items, rising food prices, and a growing desire to select health-promoting foods.

The Federal Government has developed an extensive array of regulations and programs that provide information on food. While these have helped, an overall food information strategy does not exist. As a result, information is given piecemeal and sometimes is duplicative, conflicting, and confusing.

Many Government, education, and industry food experts GAO contacted believed that a mechanism is needed that would bring together members of the food community to work cooperatively on a food information strategy. These experts helped GAO develop a model that could be used in designing a food information strategy, which should help to reduce regulatory duplication and consumer confusion.



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CE-82-12

JANUARY 8, 1982

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UNITED STATES GENERAL ACCOUNTING OFFICE

WASHINGTON, D.C. 20548

COMMUNITY AND ECONOMIC
DEVELOPMENT DIVISION

B-198417

The Honorable John R. Block
The Secretary of Agriculture

The Honorable Richard S. Schweiker
The Secretary of Health and Human Services

The Honorable James C. Miller, III
Chairman, Federal Trade Commission

This report discusses problems faced by the Federal Government in its efforts to improve the public's understanding of the food it buys and eats. It presents a case for devising a food information strategy that adequately informs Americans about food, encourages cooperation among the food community, and makes better use of existing resources.

The report contains recommendations to you on page 19. As you know, section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the House Committee on Government Operations and the Senate Committee on Governmental Affairs not later than 60 days after the date of the report and to the House and Senate Committees on appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

We are sending copies of this report to the Chairmen, House and Senate Committees on Appropriations, Senate Committee on Agriculture, Nutrition, and Forestry, House Committee on Agriculture, House Committee on Government Operations, and Senate Committee on Governmental Affairs; the Director, Office of Management and Budget; and other interested parties.

A handwritten signature in cursive script that reads "Henry Eschwege".

Henry Eschwege
Director

GENERAL ACCOUNTING OFFICE
REPORT TO THE SECRETARIES
OF AGRICULTURE AND HEALTH
AND HUMAN SERVICES AND THE
CHAIRMAN OF THE FEDERAL
TRADE COMMISSION

INFORMING THE PUBLIC
ABOUT FOOD--A STRATEGY
IS NEEDED FOR IMPROVING
COMMUNICATION

D I G E S T

Food information is becoming increasingly important, as more food products come on the market and inflation drives food prices up. Consumers need concise, clear information to choose the best foods for their needs. (See pp. 1 to 3 and app. I.)

Food information, regulations, and programs have multiplied rapidly in the past decade. Some believe the information resulting from these efforts is conflicting, confusing, and duplicative. GAO made this review to expand on its earlier suggestion that a cooperative undertaking was needed to develop a national food information strategy--a system for performing research on foods, educating consumers on research results, and communicating the facts they need to apply the knowledge gained through the education process.

This report discusses existing food information programs, their progress and problems, other countries' food information strategies, and a proposed framework for developing a food information strategy in the United States.

FEDERAL FOOD INFORMATION PROGRAMS AND
REGULATIONS: PROGRESS AND PROBLEMS

The Federal Government has developed a wide array of regulations and/or programs to control food labels and to encourage and teach good food buying, storage, and preparation habits. Billions of dollars have been spent on Federal programs affecting Americans' food choices through food and nutrition research, distribution, and production. GAO identified over 125 Federal data-gathering and information dissemination programs. (See p. 5.)

Progress includes heightened awareness of food issues, a safe food supply, and more coordination among the many Federal agencies with food information programs. However, lack of a national food information strategy has allowed programs

and regulations to be developed piecemeal, so that they are sometimes inconsistent; based on inadequate data; and formulated without integrating the research, education, and communication components of a food information system. Studies by GAO and a Presidential study have demonstrated these problems. (See pp. 6 to 12 and apps. II, IV, and V.)

APPROACHES IN OTHER COUNTRIES

Sweden and the Netherlands have taken steps to improve their food information systems, and the United States can learn from their experiences.

In 1971 Sweden began a 10-year diet and exercise program involving a cooperative mass educational campaign. Swedish officials believe the program has been successful.

In the Netherlands, a proliferation of nutritional labeling formats developed in the 1960's. Dutch officials said that the different labels raised food prices and confused consumers. A committee of experts from government, industry, and academia was formed to develop a workable labeling system. This committee recommended a single labeling format to replace the maze of labels, demonstrating that members of the food community, working together, can devise workable strategies. (See pp. 13 to 16.)

FEDERAL ATTEMPTS TO IMPROVE FOOD INFORMATION IN THE UNITED STATES

In the late 1970's the Departments of Agriculture and Health and Human Services and the Federal Trade Commission tried to change existing U.S. food-labeling laws and regulations which had been established piecemeal over 74 years. Their proposal required that food labels contain certain information without proper assurance that consumers needed or would use the information. GAO suggested in a 1980 report that the proposal not be implemented but that an overall food information strategy be developed cooperatively by a committee of representatives from Government, industry, academia, and consumer groups. The agencies are reevaluating their initial proposal. More recently, the Federal Trade Commission began to seek alternatives to the regulatory approach for monitoring food advertising. It is exploring voluntary or other methods, which

GAO believes is a step in the right direction. However, the lack of a central point for coordinating this project with other agencies' work will limit its effectiveness. (See pp. 9 to 12.)

A PROPOSED FRAMEWORK FOR DEVELOPING
A FOOD INFORMATION STRATEGY

GAO asked a wide range of food experts and others for comments on the concept of an information strategy and ways it could be implemented effectively. These experts agreed that a consortium of key Federal officials should be established to pool their expertise and develop a national plan that would, among other things,

- define U.S. food information needs and communication methods,
- provide for obtaining additional scientific information on controversial issues, and
- evaluate existing public programs to identify gaps and duplication.

The experts also believed that an advisory board should be established of food industry representatives, consumers, educators, and other interested parties to advise and contribute to the consortium. Many experts believed a top level group endorsed by the Office of the President and the Congress was needed as a catalyst. (See pp. 17 to 19.)

GAO does not envision the Federal Government as having final responsibility for resolving the complex issues involved in food information. But by working through a consortium, it can begin to address the issues in a cooperative, comprehensive way.

RECOMMENDATION

GAO recommends that the Secretaries of Agriculture and Health and Human Services and the Chairman of the Federal Trade Commission jointly develop and submit to concerned congressional committees and the President, for their critique, a strategy for improving the communication of food information to the public. The strategy should consider the views and ideas of the various food groups expressed in this report. (See p. 19.)

AGENCY COMMENTS

Health and Human Services and the Federal Trade Commission staff recognized the need for and supported GAO's intent to improve the communication, management, coordination, and evaluation of food information programs. But they disagreed with specific recommendations. Agriculture recognized the opportunity to improve food information but disagreed with GAO's recommendation. All three agencies proposed other alternatives for improving Federal food information policies and programs. Agriculture and Health and Human Services generally favored modifying the existing multiagency system.

GAO recognizes that these proposals have merit but believes that a mere modification of the existing multiagency structure would still be lacking the essential ingredient. GAO continues to believe that a central point is needed where the various Federal agencies and other parties involved in food information come together to consider common objectives and jointly establish realistic multiagency policies.

GAO encourages the agencies to develop this idea further and submit a joint proposal to the President and the Congress. (See p. 20 and apps. VI, VII, and VIII.)

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ABBREVIATIONS

| | |
|------|---|
| HHS | Department of Health and Human Services |
| FTC | Federal Trade Commission |
| GAO | General Accounting Office |
| USDA | U.S. Department of Agriculture |

CHAPTER 1

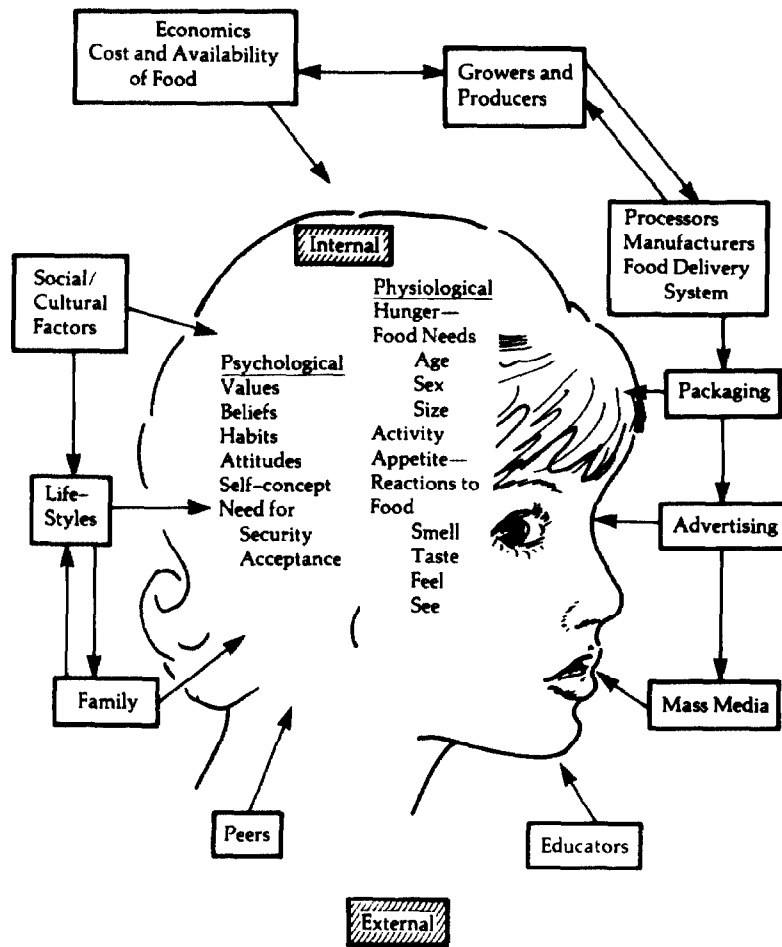
INTRODUCTION

Informed food choices can help create healthier and happier lives for many Americans. Achieving a balanced diet with adequate amounts of all nutrients and calories is essential for growth, reproduction, health, and productive work. Conversely, inadequate diets may result in ill health, higher medical costs, and a lack of productive workers.

FACTORS INFLUENCING FOOD CHOICES

Achieving a proper diet can be very difficult without pertinent, accurate, and useful information. While human beings of the same sex and age group need the same basic nutrients, their individual food choices and eating patterns are influenced by a complex set of economic, social, cultural, physiological, and psychological factors, as shown in the following chart.

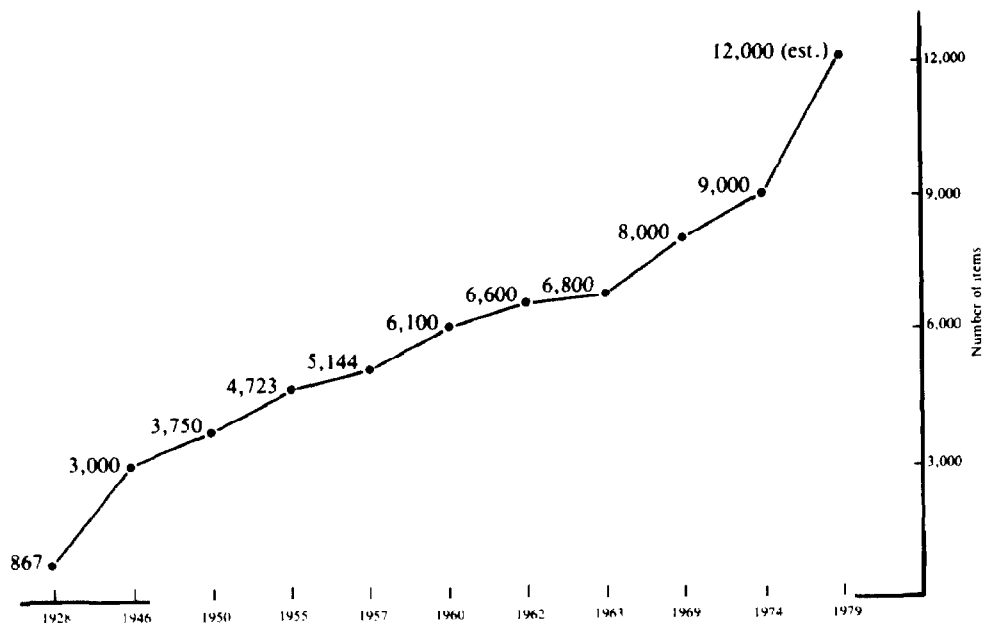
Influences on Our Food Habits--External and Internal



Source: D. Wenck, B. Baren, and S. Dewan, Nutrition: The Challenge of Being Well Nourished, by Reston Publishing Company, Inc., a Prentice Hall Company, Reston, Virginia, 1980, p. 24.

Many surveys show that most Americans have a high interest in nutrition and believe that good diets are important. But they are confused and lack knowledge on how to deal with the many factors that influence individual food choices and still select a diet that provides essential nutrients within their calorie limits. (See app. I.) This confusion is further compounded by the following factors:

--An increasing number of foods are available to satisfy family diets. Years ago when only a few basic foods were available, food choices were simpler to make. Today, an estimated 12,000 different items are offered for sale at large supermarkets, an increase of over 1,300 percent since 1928. This rapid increase in food items is shown in the following chart:



Number of items offered for sale in supermarkets. (Redrawn with permission from Public Policy Forecasting, Inc., 1979. Based on: Hampe, E. C., and M. Wittenburg. *The Lifeline of America—Development of the Food Industry*. New York: McGraw Hill Book Co., 1974 [data for years 1928 through 1963]; *Supermarket News*, May 2, 1977 [data for years 1969 through 1974]; PPFi estimate [data for 1979].)

Source: Graham T. T. Molitor, "The Food system in the 1980's " *Journal of Nutrition Education*, vol. 12, no. 2, supplement, 1980, p. 110.

- Food prices are increasing. The U.S. Department of Agriculture predicts overall food prices will rise by about 8 percent in 1981. Further impacts on food budgets are the projected increases for individual food groups, such as fresh vegetables, 20.1 percent; processed fruits and vegetables, 12.2 percent; and fats and oils, 11.5 percent.

Sound food information programs, based on proven scientific data, are very important to assist Americans in making effective decisions about food and diet in today's changing climate and economy.

This report discusses

- the vast numbers of food information programs that have been developed over the last decade,
- the progress and problems experienced,
- what other countries have done to develop food information strategies, and
- Federal efforts to provide better food information and a proposed framework for developing a food information strategy in the United States.

In this report, references to the "food community" mean those who are involved in or affected by food- and nutrition-related activities. These sectors include Federal, State, and local governments; food manufacturers and processors; farmers; trade associations; food retailers and processors; the media; the scientific community; academia; educators; consumers; and physical fitness and consumer advocates.

We also defined food information as including the following three components:

- A research component to determine which aspects of food are most critical to proper health maintenance and disease prevention, family budget, and taste.
- An educational component to convey this research on the links between food, health, and consumers' desires.
- A communication component to convey the facts and information needed to properly implement the knowledge gained through the education process.

OBJECTIVES, SCOPE, AND METHODOLOGY

In two prior reports entitled "Comments on Proposed Food-Labeling Regulations" (CED-80-89) (see app. IV) and "Comments on Food Advertising Proposals" (CED-81-27) (see app. V), we encouraged the Secretaries of Agriculture and Health and Human

Services and the Chairman of the Federal Trade Commission to seek nonregulatory approaches to gain cooperation in revamping food labels and in developing a food information strategy. We stated that a regulatory approach was not appropriate because it could result in information being placed on food labels that is not needed, used, or understood by most consumers. We suggested that a better approach would be to establish a high level committee made up of representatives from various Federal and other government agencies, industry, and consumers to develop cooperatively a national food information strategy. Our suggestion was well received by most of the food community; therefore, we undertook this review to expand on how best to implement that suggestion.

This report is based on discussions with Federal agency officials and other experts concerned with food information issues and our own reports and reports by others which are identified throughout this report. In addition, detailed information regarding federally sponsored and/or administered programs and activities relating to food production, distribution, regulation, transport, research and development, information, and other Federal activities was obtained for fiscal year 1980. To get this information we used an inventory of Federal food, nutrition, and agriculture programs prepared and maintained by the Department of Agriculture. We also conducted a literature search to identify and analyze articles and reports that raised critical issues.

We held a series of meetings with people having expertise or specific interest in food information programs. These people represented all segments of the food community and provided a broad spectrum of viewpoints on methods for improving the current system of informing consumers about food. Our selection of the individuals interviewed was based on discussions with Federal officials involved in food programs and regulations and a computer-assisted search that identified organizations and individuals involved with food information activities. We also expanded our coverage by asking those we interviewed if they knew others knowledgeable about the food information issues covered in this report. (App. III shows the organizations contacted.)

We contracted with Public Policy Forecasting, Inc., a consulting firm specializing in food policy analysis, to assist us in assessing Federal efforts and to identify effective approaches for transmitting information. This aspect also included discussions with officials in Sweden and the Netherlands to discuss successes and failures in establishing a food information policy.

CHAPTER 2

FEDERAL FOOD INFORMATION PROGRAMS

AND REGULATIONS: PROGRESS AND PROBLEMS

The Federal Government provides a wide array of programs that encourage and teach good food buying, storage, and preparation habits. These programs provide extensive food information on cost, taste, meal planning, nutrition, and health. We identified over 125 programs in 42 agencies with 1980 estimated outlays of about \$1.8 billion that had food data-gathering or information functions and over 45 programs in 22 agencies with 1980 estimated outlays of about \$9 billion that involved food education and distribution activities. In addition, the Federal Government has other food-related programs in research and development, regulation, and marketing and distribution that are being used or could be used to influence and encourage improved food selection and diets.

The Federal Government has been committed to improving consumer understanding of food and nutrition. While gains have been made, overall program effectiveness can be improved. Our studies as well as a Presidential study have demonstrated that these Federal efforts to inform the public are sometimes unduly complex, duplicative, and contradictory.

BILLIONS OF DOLLARS SPENT ON FEDERAL FOOD-RELATED ACTIVITIES INCLUDING FOOD INFORMATION

The Federal Government applies many resources to feeding, informational, educational, research, production, and regulatory programs which directly or indirectly provide food information or otherwise influence food choices. The table on the next page shows resources we could identify and how they are applied.

Federal Food-Related Activities (note a)

| <u>Activity</u> | <u>Number of departments</u> | <u>Number of agencies</u> | <u>Number of programs</u> | <u>1980 Estimated outlays</u> (billions) |
|--|------------------------------|---------------------------|---------------------------|---|
| Research and development | 7 | 38 | 194 | \$ 2.7 |
| Data gathering and information dissemination | 10 | 42 | 128 | 1.8 |
| Education | 7 | 22 | 48 | 9.1 |
| Marketing and distribution | 11 | 50 | 148 | 16.3 |
| Regulation | 10 | 29 | 81 | 7.6 |
| Production | 8 | 43 | 248 | 8.4 |

a/This data was taken from a food, agriculture, and nutrition program inventory maintained by the Department of Agriculture (USDA). The inventory was developed in the last few years, is still being refined, and contains some inconsistencies. Although not complete, this inventory is the best source available on Federal food activities. As many Federal food programs serve two or more functions (for example, 18 data-gathering and general information programs also provide educational materials to the public about food and nutrition), the categories overlap. Also, the funding levels shown represent expenditures for entire programs and not just those funds related to food information activities.

At first glance, food distribution and production programs may not seem interrelated with nutrition information and education activities. However, a closer look at these programs reveals that they are currently being used or could be used to offer and implement dietary recommendations. Statutes governing many of the distribution programs require that the programs meet "minimum nutritional requirements." Some programs, such as the Women, Infants, and Children Program, require that nutrition education be provided to participants.

LACK OF AN INFORMATION STRATEGY
LIMITS EFFECTIVENESS

Our studies since 1977 and a Presidential study have demonstrated that Federal efforts to inform the public are sometimes unduly complex, duplicative, and contradictory.

President's reorganization report

President Carter's reorganization project's final report on food and nutrition issued on December 19, 1978, found that food programs were scattered among several Federal agencies and departments. The report concluded that the sum of several agencies' programs tends to be less effective in dealing with a national goal or problem than programs designed by a single agency or coordinating council. The report cited the following examples of situations that were creating inefficiency and/or ineffectiveness:

--"Regulations covering promotional claims for food also vary. Claims on labels are subject to various Federal regulatory agencies; claims in media advertising are subject to the FTC [Federal Trade Commission] or BATF (Bureau of Alcohol, Tobacco and Firearms). There are disputes over which agency handles claims made in display materials at the point of purchase."

* * * * *

--"Consumers are given inconsistent information about the quality of food. Grades lack uniformity (e.g., ten different terms are used for the top grades of ten different commodities). This makes it difficult to compare the quality of different commodities. Regulators have not resolved questions about drained weights, percentage ingredients, and open dating."

* * * * *

--"There is no formal mechanism available to Federal agencies for achieving a working scientific consensus on the relationship between food, diet, and health. Such a mechanism is essential in developing nutrition education programs."

* * * * *

--"Scientific knowledge of nutrition is expanding rapidly. Research into the relationship of diet and health is progressing but findings are controversial. Consumers are concerned about these issues as well as the safety and nutritional quality of the food they buy. Misinformation about food and diet is widespread and most consumers have no way to distinguish between fact and fiction."

* * * * *

--"Federal nutrition information and education programs have no formal means of evaluating controversial nutrition issues in order to develop agreement on principles

and consistent Government positions on specific issues. Further, different Government agencies use different dietary guidance and nutrition education approaches, resulting in the dissemination of conflicting and inconsistent 'messages' to the public."

* * * * *

--"The Federal Government has no comprehensive nutrition education policy. Instead, it supports a patchwork of programs, some of which overlap, but which, overall, fail to serve the majority of the public."

* * * * *

--"Federal food information requirements--product definitions, grades, labels, and advertising--are confusing, redundant, and sometimes contradictory. They reflect unclear organizational jurisdictions, and fail to meet either industry or consumer needs. Food regulatory agencies lack a uniform and systematic policy on the roles that health, nutrition, and economic information play in food regulation."

* * * * *

--"Ingredient listings on food labels are inconsistent. Sometimes a manufacturer must give only a generic listing (e.g., vegetable oil); sometimes a more specific listing is required (e.g., soybean oil). Some products that are formulated according to a standard recipe need no list of ingredients, but processors can make few changes or substitutions."

* * * * *

--"There has not been a systematic study of the most effective and efficient strategies nutrition educators could use to improve their programs. As a result, program decisions are made on the basis of convention, convenience, and personal preference."

* * * * *

--"Approximately 7 out of 10 Federal nutrition education dollars are spent on community programs, yet little money has been spent on determining which methods are effective in improving the dietary practices of different groups. Agencies have no way of assessing the efficiency or cost-effectiveness of different approaches or of monitoring their nutritional impact over time."

GAO reports

Since 1977, we have issued over 15 reports that identify and document problems with the way Federal programs provide food information to the public. (See app. II.) Examples of our findings are:

- A need for greater promotion of nutrition education to work in conjunction with the School Lunch Program.
- Federal agencies' jurisdictions over nutrition information is not well-defined, and cross-agency use of information is limited.
- Although 84 percent of nutrition information is disseminated through printed materials, it has not been proven that this is the most cost-effective means.
- Federal nutrition research suffers from a lack of central focus and interagency coordination.
- To reduce confusion, consumers as well as Government and industry need better guidance on proper intake levels of fat, cholesterol, fiber, and alcohol.
- There is a maze of food regulations. For example, for food transport alone, 14 agencies and commissions have issued 1,300 regulations, covering 9,752 sections of the Code of Federal Regulations, which require some 30,000 separate actions to comply with the law.

FEDERAL EFFORTS TO IMPROVE FOOD INFORMATION

In December 1979, the Department of Agriculture, the Food and Drug Administration of the Department of Health and Human Services (HHS), and the Federal Trade Commission (FTC) proposed a series of food-labeling regulations that they believed would revise the costly, outdated rules and provide U.S. consumers with the information they want and need to make informed food choices.

In our report that commented on these proposed food-labeling regulations (CED-80-89, Apr. 21, 1980; see app. IV), we commended the Federal agencies for their original objective of developing an overall food information strategy to improve the public's understanding about the food it buys and eats. Our evaluation, however, indicated that the proposed regulations would fall short of the agencies' original objectives as they did not constitute a comprehensive strategy for informing the public about food and nutrition. The proposed regulations would have required certain information to be placed on food labels without proper assurance that consumers need or could use it.

Private industry also cautioned against these regulations, stating that they would cost millions of dollars to implement and

would not result in increased understanding. Four food companies estimated that the proposed food-labeling regulations would cost about \$6 million during the first year alone. As a result of these comments, the Federal agencies are reevaluating the proposed regulations.

In addition to this effort, FTC began to seek alternatives to the regulatory approach for monitoring food advertising. FTC is exploring voluntary or other methods, through which it hopes to provide accurate and balanced food and nutrition information to consumers. We believe that FTC's effort to seek a voluntary approach to the area of food information is a step in the right direction. But as we pointed out in a previous report (CED-81-27, Nov. 7, 1980; see app. V), the lack of a central point to guide and coordinate this with other efforts would limit its effectiveness.

These Federal projects were aimed at meeting consumers' needs for better food information. Consumer surveys indicate that many are confused about what constitutes a healthy diet. Although much information is available to them, they are not sure whose advice to believe and how to use this information. (See app. I.)

Further evidence that confusing and/or conflicting food information is being provided to the American people is shown in the chart on the next page reprinted from "Nutrition Reviews" (vol. 38, Oct. 1980). This chart shows some of the dietary advice given to the public by several organizations, including the Government, from 1966 to 1980. There are both areas of scientific consensus as well as disagreement.

Federal agencies have tried to overcome this confusion, as shown in the following examples:

- Twenty-three agency-initiated, interdepartmental mechanisms have been established to coordinate food program activities.
- USDA, HHS, and FTC held a nutrition education conference in 1979.
- The Office of Science and Technology Policy established a Government-wide nutrition research planning committee.
- In February 1980, USDA and HHS issued dietary guidelines entitled "Nutrition and Your Health: Dietary Guidelines for Your Health."
- Metropolitan Life, in conjunction with the National Institutes of Health, supported the development of public service announcements on nutrition for public TV.

Dietary Advice to the Public Recommended by Various U.S. Reports

| | Maintain Ideal Body Weight | Reduce Total Fat (% Calories) | Reduce Saturated Fat | Increase Poly-unsaturated Fat | Reduce Cholesterol | Reduce Simple Sugar | Increase Complex Carbohydrates | Increase Fiber | Reduce Sodium (g NaCl equiv.) | Other Recommendations |
|--|----------------------------|-------------------------------|----------------------|-------------------------------|--------------------|---------------------|--------------------------------|----------------|-------------------------------|-----------------------|
| American Heart Association ¹ 1965 | yes | ND | yes | yes | yes | ND | ND | ND | ND | 1 |
| American Heart Association ¹ 1968 | yes | ND | yes | yes | yes | ND | ND | ND | ND | |
| American Heart Association ² 1978 | yes | yes (30-35%) | yes | yes | yes (300 mg) | yes | yes | no | yes | 2 |
| Dietary Goals First Edition ³ 1977 | no | yes (30%) | yes | yes | yes (300 mg) | yes | yes | yes | yes (3 g) | 3-6 |
| Dietary Goals Second Edition ³ 1977 | yes | yes (27-33%) | yes | yes | yes (250-350 mg) | yes | yes | yes | yes (8 g) | 2-8 |
| Healthy People ⁴ 1979 | yes | yes | yes | no | yes | yes | yes | ND | yes | 6-10 |
| AMA Recommendations ⁵ 1979 | yes | * | * | * | * | moderate | ND | ND | yes (12 g) | 2-9 |
| NCI Prudent Interim Principles ⁶ 1979 | yes | yes | ND | no | ND | ND | ND | yes | ND | 2-8 |
| ACSH Report 1980 | yes | no | no | no | no | ND | ND | ND | no | 6-7 |
| USDA-DHEW Guidelines 1980 | yes | yes | yes | no | yes | yes | yes | yes | yes | 2-9 |
| FNB Recommendations ⁷ 1980 | yes | adjust to calorie need | no | no | no | ** *** | *** | **** | yes (3-8 g) | 2-8 |

ND—not discussed

*—for high risk groups

**—if energy needs are low

***—for diabetics at risk

****—as dictated by Basic Four Food Groups

¹Committee on Nutrition authorized by the Central Committee for Medical and Community Program

²Nutrition Committee of the Steering Committee for Medical and Community Programs

³Select Committee on Nutrition and Human Needs, U.S. Senate

⁴Julius B. Richmond, Assistant Secretary for Health and Surgeon General

⁵Adopted by American Medical Association House of Delegates

⁶of the National Institutes of Health, Department of Health, Education and Welfare

⁷of the Division of Biological Sciences, National Research Council, National Academy of Sciences

Other Recommendations:

1. apply dietary recommendations early in life, maintain principles of good nutrition, adhere to aforementioned guidelines, make sound food habits a family affair
2. moderate/reduce intake of alcohol
3. moderate/reduce use of additives
4. moderate/reduce use of processed foods
5. associates use of sugar with diabetes
6. considers special needs of high-risk groups and special populations
7. stresses importance of variety in a well-balanced diet
8. encourages exercise
9. encourages breast feeding

Source: Kristen McNutt, "Dietary Advice to the Public: 1957 to 1980," Nutrition Reviews, Vol. 38, no. 10, Oct. 1980, p.355.

Many steps have been taken to improve coordination and cooperation among the various sectors of the food community. Several mechanisms have been established to bring together each Federal agency concerned with food and/or nutrition as well as academia, foundations, and private industry. These activities are commendable and represent an effort to improve the way that food information and education is developed and communicated. But there is a problem with this approach--the many devices for coordination, cooperation, and dialog lack a central point that can provide leadership to the Federal departments and agencies. We have called attention to this problem in previous reports. (See apps. II, IV, and V.)

CHAPTER 3

OTHER COUNTRIES HAVE DEVELOPED

ALTERNATIVE APPROACHES

To identify alternative mechanisms that could help in establishing a food information strategy, we commissioned Public Policy Forecasting, Inc., to study programs that could be used in the United States. Programs developed by Sweden and the Netherlands were chosen for evaluation because they have been consistent pace setters in seeking and implementing new public policy solutions to problems faced by their people. These countries are among the affluent, urban, highly developed, advanced industrial countries of Western Europe and have many patterns in common with the United States. Diet in these countries is characterized by abundance. The social concerns surrounding problems of food excess increasingly focus on the need for national policies to provide basic information and understanding so that people can make intelligent choices to improve their diet and health.

While recognizing the difficulty of comparing the United States with other countries because of social, political, and cultural differences, we believe we can learn from their experiences. Following are comments and conclusions taken from the research performed by Public Policy Forecasting, Inc.

SWEDEN'S FOOD INFORMATION POLICY

During the 1950's and 1960's, a diverse group of organizations administered various parts of Swedish food policy. To coordinate the decisionmaking processes, the Swedish Food Law Committee recommended consolidating most food activities into an oversight committee. Together, the National Board of Health and Welfare, the National Food Administration, the National Swedish Board for Consumer Policies, and the national and municipal government organizations make up the Swedish Government's team responsible for disseminating nutrition information. Their overall direction comes from the Health Education Committee, appointed by the Government. The Committee consists of 11 members, representing different authorities; organizations; and other interest groups, such as mass media, schools, and health and medical institutes. The Committee meets about eight times a year to make policy decisions, and one of its main issues is diet and exercise.

In 1971, a 10-year diet and exercise program was started to promote better eating habits and regular physical exercise. The program aims at reducing consumption of fat and sugar and increasing consumption of lean animal products; grain products; and vegetables, especially potatoes and other root crops. Encouraging regular exercise is also a program goal.

The diet and exercise program's messages are disseminated either in the form of selective information to specific target groups or in campaigns aimed at the general public. Emphasis today is on selective information for specific target groups because of the difficulty of reaching the whole population with general information.

In general, the Swedish food industry, specifically the food producers and retail distributors, cooperates with the Committee and supports its goals. The food industry has been responsible for the bulk of the nutrition information disseminated in Sweden, both through financial support for Committee activities and through industry activities.

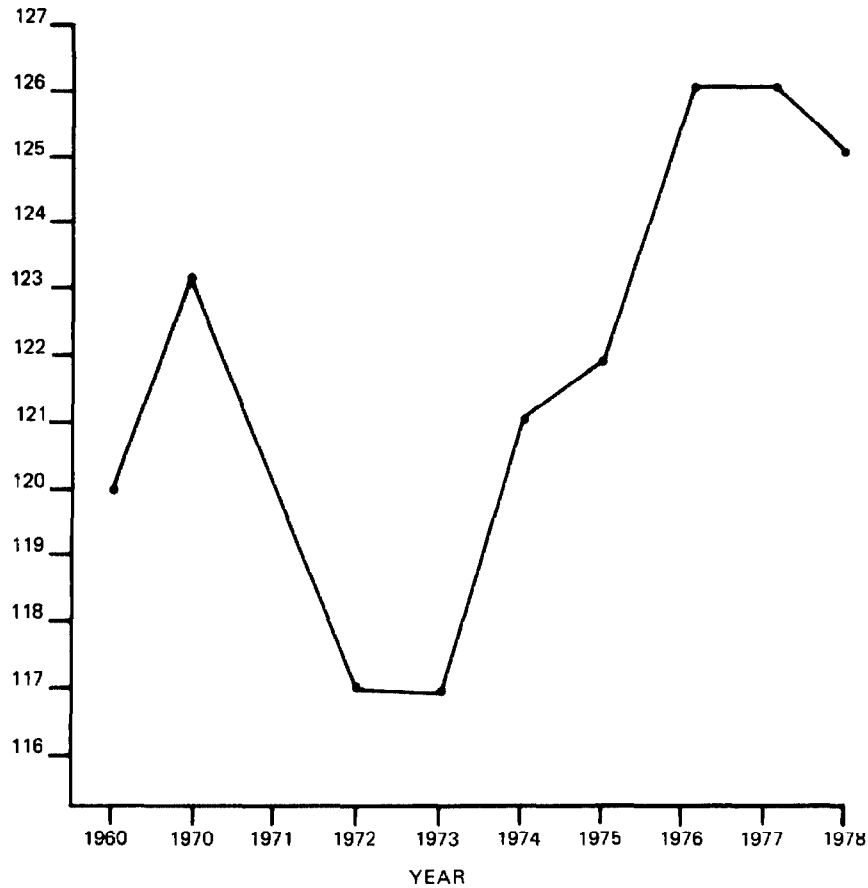
By developing a comprehensive program to inform the public about food and exercise, the Swedish Government has provided its people with the tools to improve their diet and health. This program, along with other preventative health measures, has contributed to the Swedes' medical achievements and health successes which have become respected around the world. The Swedish people enjoy the longest life expectancy and lowest disease rate of any country in the world. Yet, Swedish medical care costs are low compared to U.S. health care costs.

On the other hand, the Swedish Government has encountered some setbacks in its attempts to improve the health of its people. In the early 1970's, Sweden started a fat-labeling program coupled with other public information and consumer education programs. These focused on nutrition training given in the public schools. Adult education programs were also undertaken. Early indicators showed that this effort appeared to have effect, as daily per capita fat consumption declined. In 1974, however, consumption of fat started to increase, reaching an alltime high in 1976 and 1977. These increases were contributed to in part by the Swedish Government's introduction in 1973 of food subsidies for foods with high fat content, such as cream, cheese, pork, cured meats, and others. The effect of these subsidies was to reduce the price of these items to the consumer, which in turn increased demand and consumption.

From this experience, the Swedish Government recognized that problems could be associated with promoting high fat consumption. After prices for some of these same products were allowed to rise steeply (during 1977) the higher prices began to depress consumption. These changes are shown in the following diagram.

Sweden: Fat Consumption

Daily fat consumption
per capita in grams



Source: Based on data provided by Statistical Abstract of Sweden, p. 237; Var Foda, National Food Administration, July 1978, p. 267 (Molitor, p. 423).

The cross-play of forces unleashed in the situation just described underscores the need to account for the many and sometimes conflicting interests affected by food policy decisionmaking. These forces include:

- Nutritionists who seek to meet national nutrition goals.
- Consumers who seek lower prices.
- Farmers who pursue an acceptable income.
- Foreign policymakers who attempt to increase self-sufficiency in domestic agriculture (in the event of war or trade disruption).

Realizing that changing people's habits is a major, long-term undertaking, the Swedish have implemented a second 10-year diet and exercise program to continue the gains achieved during the first 10 years.

THE NETHERLANDS' FOOD-LABELING FORMAT

The Dutch, along with other populations in advanced industrial countries, consume too many calories. Dutch Government officials are still grappling with the question of how to bring about an overall reduction in caloric consumption. The preferred choice among most officials is to provide information upon which an informed opinion could be made, leaving final judgment to the individual consumer. The Dutch experience with a food-labeling disclosure system provides some valuable lessons.

A nutritional labeling approach was begun in the early 1970's by a large Dutch supermarket chain--Albert Heijn Supermart B.V. Its symbolic disclosure systems have greatly influenced other nutrition labeling formats and public debate in many countries.

While the system has some merit, a number of problems have developed, including:

- The system is costly to implement.
- Consumer reaction to the system has declined, casting doubt on its value to the average consumer.

In addition, doubts about continuing the system were fueled by other competitors' seeking approval from the Dutch Government for a wide variety of different formats. Many kinds of labeling systems are already in use, which has led to increased food costs and widespread consumer confusion.

We were told that once other competitors developed and implemented different nutrition labeling systems, consumer understanding deteriorated to the point that a single, uniform system was needed. At this point, a so-called "committee of five," composed of experts from government, industry, and academia, was established to undertake a cooperative search for a uniform nutrition labeling format to be used throughout the Nation. This committee has recommended a single labeling format to replace the maze of labels.

Dutch officials believe that the following lessons can be learned from their experiences with food labeling:

- When everyone goes his own way, the effectiveness of the information system is reduced and higher costs and consumer confusion result.
- High-level representative bodies can produce useful and workable strategies to solve problems that affect all sectors of society.

The next chapter discusses a process and structure that could be used for developing a U.S. food information strategy. The framework, or model, presented should not be considered final, but as a catalyst for further discussion.

CHAPTER 4

A PROPOSED FRAMEWORK FOR DEVELOPING

A FOOD INFORMATION STRATEGY

Several mechanisms, including 23 relatively formal, ongoing, agency-initiated coordinating activities, have been established in different Federal agencies to address food issues. These activities are certainly important, and we support their individual goals. However, these activities do not constitute a national strategy that incorporates the needs and concerns of the Federal Government with those of the private sector. Something new is needed to draw the Federal programs together into a coordinated system--not just another separate Government coordinating body or program. The private sector needs to be fully involved in developing rational, realistic policies and in helping to build cooperation and trust between the private and public sectors--both of which are needed to increase overall effectiveness of the food information system.

In an earlier report (CED-80-89, Apr. 21, 1980; see app. IV), we suggested that one vehicle for formulating a national food policy could be a Presidential committee composed of members from Federal, State, and local governments; industry; consumer groups; trade associations; and communication specialists, educators, researchers, and health professionals. This committee could provide guidelines to equip the consumer with useful and understandable information about food.

We obtained feedback from a wide range of people interested or affected by the Federal Government's food information programs. Individuals and groups that responded included farmer associations, communication experts, consumer groups, research associations, educators, private industry, and trade associations. We requested comments on our suggestions and ways they could be effectively implemented and on other alternatives that could be used to develop an overall food information strategy. Excerpts from the responses follow:

- A food information policy is needed and should be developed through the cooperative efforts of all groups.
- The method of solving U.S. nutrition information and education problems should not be based on developing extensive regulations, but rather should focus on an open dialogue among consumers, industry, Government, and others interested in the area.
- It is appropriate that the current food information system be reevaluated at this time and changes made based on well-designed consumer research data.

--A concerted effort is needed to delineate the objectives of a nutrition labeling program and the most cost-effective way of attaining these objectives. The present approach of piecemeal legislation requiring frequent change is an inordinately expensive approach for consumers and one which has failed to meet consumer needs.

To move forward, the people contacted believed that a focal point should be developed to provide leadership for food information programs. They envisioned a consortium of Federal agencies involved in food information that would

--develop an operating plan to outline what the Federal Government is doing and should be doing to provide food information and

--provide for input from the non-Federal food community to advise the consortium on the appropriate actions the Federal Government should take to make needed improvements. If properly used, this input could contribute to improved cooperation between the public and private sectors of the food community.

In establishing a consortium and outlining its duties and responsibilities, these experts agreed that the following ideas need to be considered:

--A consortium of key Federal Government officials should be established to develop a national plan that would

1. define American food information needs and the best methods to communicate them;
2. provide for obtaining the additional information and/or scientific facts needed to resolve controversial issues;
3. provide for evaluating existing public programs to identify gaps and duplicative efforts;
4. review existing coordinating groups to determine if they are still needed and if membership is adequate to accomplish assigned tasks;
5. propose and assess alternative methods of accomplishing objectives of individual programs and regulations; and
6. assess the impact the developed strategy will have on consumers, industry, and Government.

--A National Food Information Advisory Board should also be established from the food industry, consumers, educators, and other interested parties to advise and provide input to the consortium.

Educator and industry representatives and officials of USDA, HHS, and FTC expressed a willingness to cooperate with each other in developing a food information strategy. All that seemed to be missing was a catalyst to get the ball rolling.

Most experts believed the catalyst needed was a top level group endorsed by the Office of the President and the Congress that could provide leadership to the many Federal departments and agencies involved with food information. The numerous Federal programs that provide food information should have some form of central review to come up with meaningful policy initiatives. While the Federal Government has an impact on food information, the issues that need to be addressed are too broad to be resolved within the confines of the individual departments. (See app. V.)

CONCLUSIONS

Because of the complexities and ramifications of the issues that need to be addressed, we believe that the Federal Government, the food industry, consumers, food retailers, health-care specialists, the media, and educators need to work together in developing and implementing a coordinated, workable approach to collecting and disseminating food information. While bringing these groups together may create conflict, we believe that by pooling their knowledge and resources and sharing their concerns they could reach agreement.

Discussions with industry, trade association, academic, and consumer representatives have revealed their willingness to cooperate with Government and each other in developing a food and nutrition information strategy. Therefore, the climate appears right to develop a consortium that would provide leadership over Federal food information programs.

RECOMMENDATION

As a food and nutrition consortium is being developed, the views of food experts expressed in this report should be considered along with FTC's experience in organizing a voluntary program to disseminate information on diet and health.

We recommend that the Secretaries of Agriculture and Health and Human Services and the Chairman of the Federal Trade Commission jointly develop and submit to concerned congressional committees and the President, a strategy for improving the communication of food information to the public. The strategy should incorporate the views and ideas of the various food groups expressed in this report.

AGENCY COMMENTS

Comments on the report were requested and received from HHS, USDA, and the FTC. As a result of these comments, we made some changes where appropriate in the body of the report but did not change our basic conclusion.

Both HHS and the FTC staff recognized the need for and supported our intent to help improve communication, management, coordination, and evaluation of food information programs. However, they disagreed with specific elements of our recommendation. USDA recognized that communicating food information could always be improved but disagreed with the recommendation.

The agencies provided alternative proposals for improving Federal food information policies and programs. The FTC staff believed that a cooperative effort already underway would achieve many of the objectives the report advocates. (See app. VI.) HHS believed the best way to achieve the report objectives is through strengthening existing programs. (See app. VII.) USDA also believed the best way to improve information communication and cooperation is by strengthening existing programs, specifically expanding the mission of the existing Office of Science and Technology Policy (OSTP) Joint Subcommittee on Human Nutrition Research. (See app. VIII.)

We recognize that these proposals have merit but believe they lack an important element--a central point where the activities of the various Federal agencies and other involved parties are brought together. Our recommendation was intended to provide a focal point for developing more indepth plans and to help establish rational and realistic policies. We believe that the Federal Government, the food industry, consumers, food retailers, health care specialists, the media, and educators need to work together in developing a coordinated, workable approach to collecting and disseminating food information.

Our report does not exclude the option of revising existing programs to design a coordinated food information policy. Expanding the responsibility of an existing committee, such as the OSTP Joint Subcommittee on Human Nutrition Research or some other committee, to include a role as a central point for organizing multi-agency activities and soliciting private sector input, would be consistent with our recommendation. We encourage the agencies to develop their ideas further and submit a joint proposal to the President and the Congress.

SUMMARY OF REPORTS AND SURVEYS ON U.S.
CONSUMER KNOWLEDGE, ATTITUDES, AND
INTEREST IN FOOD AND NUTRITION

Considerable interest and controversy surround the subject of food and nutrition. To assess this interest and measure consumers' food and nutrition knowledge, attitudes, and practices, numerous studies have been conducted by government, industry, universities, marketing research agencies, and others.

To gain some insight into what consumers know, believe, and practice, we have summarized 3 recent consumer surveys and one report synthesizing 32 consumer surveys that were published between 1972 and 1977. According to surveys analyzed, most Americans have a high interest in nutrition and believe that good diets are important. However, many consumers were confused by government health warnings and considered themselves to be less than well-informed on many nutrition issues. Specific excerpts from the surveys reviewed follow:

1. "The General Mills American Family Report 1978-79: Family Health in an Era of Stress," conducted by Yankelovich, Skelly, and White, Inc., for General Mills, Inc.

In interviews with a national sample of 1,254 families, statistically projectable to all U.S. families, the researchers found the following:

- 70 percent said that most Americans are more concerned about health than they were a few years ago.
- 25 percent said they are eating more nutritiously than they were a year ago.
- 26 percent said they are watching calorie intake more carefully than a year ago.
- 36 percent said they were exercising regularly.

While family health attitudes and behavior seemed to be improving, the researchers reported that:

- 76 percent consider themselves to be only somewhat or poorly informed on nutrition and diet.
- 76 percent were confused about all the government health warnings.

2. "Woman's Day Family Food Study; Nutrition--A Study of Consumers' Attitudes & Behavior Towards Eating at Home & Out of Home," Conducted by Yankelovich, Skelly and White, Inc. Previewed at the 1978 Food Marketing Institute Convention.

In interviews with a national modified probability sample of 1,188 consumers, 18 years of age and over, projectable to the population sample, the researchers found the following:

- 77 percent of all consumers feel that they are more interested in nutrition than they were a few years ago.
- 55 percent say they are eating more nutritiously than they were a few years ago.
- 24 percent feel they are very well-informed about nutrition.

The researchers conclude that government product safety regulations and the publicity given to them have had a dual impact. On the one hand, they have contributed to a far more aware and alert public. For example, consumers report they are concerned about the following foods, ingredients, and additives in these proportions:

| <u>Percent of consumers reporting concern</u> | <u>Food, ingredient, or additive of concern</u> |
|---|---|
| 83 | Appearance |
| 76 | Vitamins |
| 71 | Use of pesticides |
| 69 | Calories |
| 65 | Adequate fibers |
| 64 | Cholesterol |
| 64 | Sugar |
| 62 | Additives |
| 62 | Natural grains |
| 59 | Fortified foods |
| 54 | Sodium |
| 47 | Coloring |
| 32 | Saccharine |

However, on the other hand, a certain backlash is evident:

- 71 percent agree that there is too much talk these days about what is good and bad for you when it comes to food.
- 53 percent see controversy over product safety as a barrier to good nutrition.

3. "General Foods Corporation, 1980 National Survey," conducted by the National Center for Telephone Research, a division of Louis Harris and Associates, Inc.

In telephone interviews with 1,001 persons, a randomly selected national cross-section of the American public (48 States), researchers found that consumers do not have accurate information about good nutrition. Specific findings follow:

- More than 70 percent of the consumers surveyed said they had little or no familiarity with U.S. dietary guidelines published in 1980.
- More than 50 percent of the consumers surveyed did not give the correct answer to or had no opinion on 7 out of 10 questions about nutrition.

4. "General Mills, Inc. A Summary Report on U.S. Consumer Knowledge, Attitudes, and Practices about Nutrition"

This report summarized 32 consumer surveys published between 1972 and 1977 to meet the following objectives:

- Summarize, analyze, and interpret existing surveys about consumers' nutrition knowledge, attitudes, and practices.
- Provide a profile of today's American consumers' knowledge, attitudes, and practices regarding nutrition.
- Make inferences about consumers' nutrition education needs.

The summary report concluded that:

- Consumers want to do what is nutritionally correct; however, their ability to accomplish this varies according to age, income, and educational status.
- Significant segments of the population are probably not being reached with current modes of nutrition education.
- The incidence of dietary deficiencies for certain nutrients like vitamin A, calcium, and iron in certain segments of the population is an indicator that we need to increase our educational efforts.
- Additives in food seem to be a widespread concern. Lack of knowledge of the benefits of additives and fear of the unknown are probably consumers' main reasons for avoiding food containing them.

- Consumers appear misinformed about food processing. It is perceived as synonymous with using additives and taking away "natural" nutrition, and therefore is viewed as undesirable and harmful.
- Erroneous beliefs are held by consumers in the area of naturally occurring versus synthetic nutrients. As a result, consumers are willing to pay more for natural foods.
- When consumers are well informed and motivated about nutrition, it is reflected in their eating behavior.

SUMMARY OF GAO REPORTS SINCE 1977 ON FEDERAL FOOD
REGULATIONS, INFORMATION, AND EDUCATION PROGRAMS

1. "What Causes Food Prices to Rise? What Can Be Done About It?"
(CED-78-170, Sept. 8, 1978)

SUMMARY:

According to the Bureau of Labor Statistics (BLS), food price levels increased 57 percent from the beginning of 1970 through 1976, including a 31-percent increase in 1973 and 1974. The Consumer Price Index shows that over the last 50 years food prices have been susceptible to wider fluctuations than the prices of other goods. Farm prices and food prices are usually generated in two different markets--the market for raw agricultural commodities and the market for finished food products.

Farm prices of raw agricultural commodities are influenced largely by such unpredictable natural forces as the weather, pests, and crop disease. Farm and food prices are influenced by other factors that affect supply, such as Federal programs for cropland set-aside, commodity disposal, export sales, and marketing orders; production costs; and the length of the production cycle. Higher marketing charges accounted for 87 percent of the increase in consumer expenditures since 1973. The largest food-marketing cost is labor. There are four principal reasons why food prices do not always decline when the farmer receives less for the raw commodity: (1) a drop in farm value may have little or no impact on the retail price when the farm value is a small percentage of a product's price, (2) a decrease in farm value may be offset by increases in the cost of marketing, transporting, assembling, and wholesaling, (3) retail pricing methods are based on factors other than product cost, and (4) food chains may not pass on price drops to the consumer. Several problems relating to the collection, analysis, and presentation of food price statistics published by the Federal Government have limited the statistics' reliability and usefulness.

Recommendations: If the Congress establishes a permanent bureau of agricultural statistics or national commission on food production, processing, marketing, and pricing, it should provide the agency with the authority to assure access to food industry records and provide for adequate safeguards to protect confidential records. The Congress should direct BLS to institute a retail price collection program which would allow BLS to publish nationwide average retail prices for individual commodities and allow the Department of Agriculture

(USDA) to resume publishing farm-value/retail-price spreads. The Secretaries of Agriculture and Transportation and the Chairman of the Interstate Commerce Commission should conduct an indepth study of the problem of raw agricultural commodity haulers' having to drive many miles with empty trucks and should develop and propose legislation if such a need exists.

UPDATE:

In its comments, USDA said the report recommended actions which, if taken, would contribute significantly to improving its ability to monitor and report the relevant indicators of food price changes on a timely basis. BLS and the Office of Management and Budget did not see any reason to change the present method of collecting, analyzing, and presenting food price statistics.

Public Law-96-296, July 1, 1980, allows haulers of raw agricultural commodities to carry nonagricultural products on the return trip. This could significantly decrease the number of empty truck miles driven by these haulers.

In late August 1980, a USDA official said that the Department is making the studies necessary to implement GAO's recommendations to improve USDA's food price statistics, especially the farm-value/retail-price spread and the percentage of disposable income spent for food. It was not known when these improvements would be implemented.

2. "Federal Domestic Food Assistance Programs--A Time for Assessment and Change" (CED-78-113, June 13, 1978)

SUMMARY:

Thirteen major Federal domestic programs, costing several billion dollars annually, provide food or food-related assistance to needy Americans. The programs are administered by the Department of Agriculture, the Department of Health, Education, and Welfare (HEW), ^{1/} and the Community Services Administration (CSA). These programs have helped many people obtain more adequate diets. However, the large and accelerating costs of the programs, their piecemeal authorization and administration, and proposals for comprehensive welfare reform have created a need and opportunity to examine the programs' interrelationship and

^{1/}On May 4, 1980, when a separate Department of Education was created, HEW became the Department of Health and Human Services. Therefore, HEW or HHS are designated throughout app. II depending on whether the activity took place before or after this date.

effectiveness. Multiple participation in the programs, which is sanctioned in legislation, has created a situation in which benefits often exceed amounts needed for thrifty food plan diets. Food stamp allotments ranged from 82 percent to 164 percent of the cost of such diets. Savings could be realized by making adjustments for different ages and sexes of household members. The extent of food benefit gaps and overlaps cannot be measured precisely because of inadequate data collection. Administrative problems result from varying eligibility criteria and procedures, lack of a uniform definition of "needy," and inadequate program coordination. There is also a lack of adequate data to determine the proper level of benefits, interrelationships of the programs, and the nutritional effectiveness of the programs.

Recommendations: The Secretaries of Agriculture and HEW and the Director of CSA should determine the extent of benefit overlaps and gaps among the programs; develop and carry out a way to measure Americans' nutritional status in order to evaluate the effectiveness of food assistance efforts; propose consistent income and asset eligibility requirements and procedures and study their effects on program participation, costs, and work incentives; establish demonstration projects to test procedures for individualized food stamp allotments; study the feasibility of considering benefits from one program when determining eligibility and benefits in other programs, and consolidating aspects of certain programs at the local level; explore alternatives to food delivery systems in the Women, Infants, and Children (WIC) Program; make sure that persons in need of specific benefits from one program are aware of other programs; and study ways to encourage the exchange of information among local administrators.

On the basis of studies and feasibility, the Congress should define "needy," approve a policy on amounts of assistance, consolidate programs, authorize individualized food stamp allotments, eliminate duplicative benefits, and require administrative responsibility in a single State/local agency.

UPDATE:

Some preliminary action is being taken on some of the recommendations, but no action has been taken to (1) establish demonstration projects to evaluate increased costs resulting from individualized food stamp allotments, (2) study the administrative feasibility of considering food benefits from child-feeding programs when determining food stamp eligibility or benefits, and (3) explore alternatives to the WIC food delivery systems. Also, no action has been completed on the recommendations to the Congress.

3. "The Impact of Federal Commodity Donations on the School Lunch Program" (CED-77-32, Jan. 31, 1977)

SUMMARY:

The Department of Agriculture's purchasing and distributing of commodities for the school lunch program were reviewed in five States (California, Kansas, Missouri, Ohio, and Pennsylvania) and 15 school districts to assess the responsiveness of the Federal commodity program to the needs of school districts; evaluate the advantages and disadvantages of school districts receiving cash in lieu of Federal commodities under the school lunch program; and assess the reasons for plate waste (food served to the student but not eaten) in the school lunch program and identify possible solutions to the problem.

The USDA surplus removal and price-support programs go a long way toward meeting the needs of school districts. However, improvements are needed to make the school lunch program more effective and responsive to school district needs. The USDA Food and Nutrition Service has not taken adequate steps to make sure that the commodity preferences reported by the States are based on and reflect school district needs. Sometimes certain "traditional" items continue to be provided without being accepted by the States, and Department commodity purchase policies sometimes result in commodity purchases not highly preferred by the States. Districts, consequently, were being offered goods that did not match their needs or desires. Relative commodity costs are higher for smaller school districts than for the larger ones. If most districts, as they want, receive cash in lieu of Federal commodities, small district food costs might increase.

Recommendations: The Secretary of Agriculture should (1) establish procedures so that school districts' views are reflected in preference reports and considered in the purchase and distribution of Federal commodities, (2) require States to pass on to the school districts all available commodity options, (3) expand the means of finding out from States and school districts what commodities are acceptable, (4) improve the timing of Federal commodity deliveries, (5) review costs and benefits of providing commodities in a more acceptable form and quality, (6) undertake greater promotion of nutrition education in school health programs to help reduce plate waste, (7) do more to encourage State and local school authorities to improve lunch facilities and atmosphere, (8) require States to give districts more advance notice of commodity deliveries, and (9) include a nutrient standard as an option to the Type A lunch pattern to provide greater flexibility in using commodities.

UPDATE:

The Food and Nutrition Service has taken steps to implement all but one of the recommendations. On this recommendation, the Service is continuing to evaluate the use of a nutrient standard as an option to the standard meal pattern. GAO is currently reviewing the purchase and distribution of commodities for the various domestic food assistance programs.

4. "Comments on Food Advertising Proposals" (CED-81-27, Nov. 7, 1980)

SUMMARY:

Because of the complexities and ramifications of the issues that need to be addressed, GAO believes that the Government, the food industry, consumers, food retailers, health care specialists, the media, and educators need to work together in developing and implementing a coordinated, sequenced, and workable approach to the accumulation and dissemination of food and nutrition information. While bringing these groups together may create conflict, GAO believes that they could reach agreements and assess tradeoffs by pooling their knowledge and resources and sharing their concerns. One mechanism that could best accomplish the formation of a national food information policy would be a committee established by law to better ensure performance of policy objectives. The committee would be composed of members from the groups mentioned above. It could provide guidelines for organizing public and private resources to equip the consumer with useful and understandable information about food.

5. "Nationwide Food Consumption Survey: Need for Improvement and Expansion" (CED-77-56, Mar. 25, 1977)

SUMMARY:

The Nationwide Food Consumption Survey, which the Department of Agriculture began in April 1977, was reviewed in order to determine what types of analyses can be done with the data, what planning changes have occurred since survey conception in 1974, and whether it will yield accurate information on the diet of low-income families and of overall food consumption in the United States. The sample will be of 15,000 households with 5,000 low-income households, almost half of whom participate in the food stamp program. The survey sample is too small to provide useful information in evaluating food assistance programs and in identifying nutritional problems of low-income families. Additional low-income families should be sampled to provide this information. The survey methodology has not been fully validated, and the results will be open to criticism. There are no assurances that the data obtained will actually measure the amount of food consumed.

Recommendation: USDA should fully validate the Nationwide Food Consumption Survey methodology either before or during the survey and develop objectives and analysis plans for the survey before the sample is drawn.

UPDATE:

USDA accepted the recommendations and made changes in survey and validation methodology. GAO's survey staff has worked with USDA consultants to develop validation methodology.

6. "National Nutrition Issues" (CED-78-7, Dec. 8, 1977)

SUMMARY:

The United States is fortunate in that most citizens have access to nutritious, safe food. Its citizens are among the best fed in the world, and it has many Government agencies and programs designed to assure food supply, to make food available to those in need, and to ensure food safety. Over the past 10 years the Nation's concern about food has increasingly turned from basic supply to adequate nutrition. Inadequate nutrition has become more and more linked with this country's leading causes of death. As these links have been better defined, it is apparent that adequate nutrition is an integral part of preventive disease protection. The United States has no formal, written nutrition policy. Rather, it has a de facto policy which is, in effect, a piecemeal series of programs instituted over the years, often because of a sense of emergency and with little thought given to the interaction or relationship with existing programs. The existing programs clearly would be part of any structured nutrition policy, albeit in different forms. Issues that should be considered include the extent of the role nutrition considerations should play in food and health policy decisions, whether a more formal nutrition policy should be adopted with explicitly stated goals and objectives, whether a central authority or a formal coordinating group for nutrition matters should be established, and how far the Government should intercede in promoting dietary practices.

UPDATE:

No recommendations were made in the report. However, this report is important because it defined nutrition issues for future GAO work. The Department of Health and Human Services used this report to set the agenda for its nutrition coordinating committee.

7. "Informing the Public About Nutrition: Federal Agencies Should Do Better" (CED-78-75, Mar. 22, 1978)

SUMMARY:

A large share of the Nation's health costs has been attributed to hunger and poor eating habits. A primary cause of poor nutrition is lack of consumer knowledge about the proper selection and preparation of food. Most of the Federal Government's nutrition information is produced by the Department of Agriculture and the Department of Health, Education, and Welfare, and 12 agencies within these departments disseminate information developed by at least seven Federal departments and commissions. Information concerning Federal spending for nutrition information and education is not readily available, but the Congressional Research Service determined that at least \$69.3 million was spent for nutrition education in fiscal year (FY) 1976. Results of a questionnaire indicated that agencies in USDA and HEW lacked defined areas of responsibility, making it difficult for users to identify sources of materials on specific topics; use of nutrition materials authorized by other agencies was limited; printed materials accounted for 84 percent of materials disseminated, although there was no assurance that this was the most effective method of dissemination; few materials developed by the Federal Government were formally evaluated; only 5 of 352 publications identified had a total distribution of over 1 million copies in FY 1975 and 1976, and most agencies lacked information on the cost to develop materials for dissemination.

Recommendations: The Secretaries of USDA and HEW should designate a central authority to serve as a continuing review board in the future development of nutrition information materials; establish an interdepartmental task force which would assess nutrition-related material developed by each department; and establish an interdepartmental task force to consider such matters as coordination between departments to avoid duplication and ensure coverage of necessary areas, the most cost-effective means of reaching consumers, and the role of the Federal Government in cooperating with State and local agencies. Results of task force reports and recommendations should be submitted to the Congress.

UPDATE:

Both Departments have taken action to centralize authority over dissemination of nutrition information. GAO has not performed additional review work to determine if this action has been successful in eliminating duplications and improving the quality of released information.

8. "Federal Human Nutrition Research Needs a Coordinated Approach To Advance Nutrition Knowledge" (PSAD-77-156 and 156A, Mar. 28, 1978)

SUMMARY:

Each year the Federal Government spends between \$73 million and \$117 million on human nutrition research. This represents about 3 percent of the \$3 billion it spends annually on all research in agriculture and health. Several Federal departments and agencies support human nutrition research although no department or agency has human nutrition as its primary mission. Major knowledge gaps and related research needs have been classified into four broad and interrelated areas that are important for sound nutrition planning, whether a nutrition program's target is an entire population, a population subgroup, or an individual. The areas include human nutritional requirements; food composition and nutrient availability; diet, disease causation, and food safety; and food consumption and nutritional status. Research needs for responding to these knowledge gaps include long-term studies of human subjects across the full range of both health and disease; comparative studies in populations of different geographic, cultural, and genetic backgrounds; basic investigation of the functions and interactions of dietary components; updated and expanded food composition data, and improved techniques for assessing long-term technological risks. The following barriers to nutrition research persist: lack of central focus and coordination, shortage of nutrition scientists, and uncertainty of Federal funds for extramural research.

Recommendations: The Director, Office of Science and Technology Policy, should work with Federal agencies to further define areas of human nutrition research and make recommendations to the Director, Office of Management and Budget, to assign, where practicable, each area to a lead agency; eliminate unnecessary research that may exist among Federal agencies; and promote Government-wide human nutrition research planning, coordination, and reporting.

UPDATE:

Partly as a result of this report, HEW, USDA, and OSTP established several nutrition coordination mechanisms to promote nutrition research planning, coordination, and reporting. OSTP established a Government-wide nutrition research planning committee. HEW and USDA created nutrition coordinator positions in their respective departments. The report has stimulated the nutrition community, been included in an Office of Technology Assessment report on nutrition research, and been used as a background paper in the administration's attempt to reorganize the Federal food and agriculture bureaucracy. The report, along with several other congressional and administration reports on nutrition research, is probably partly responsible for the added attention, focus, and Federal funding of nutrition research in recent years.

9. "Need for a Comprehensive National Nutritional Surveillance System" (CED-78-144 and 145, June 29, 1978)

SUMMARY:

The Departments of Agriculture and Health, Education, and Welfare developed and submitted to the Congress a joint proposal for a comprehensive Nutritional Status Monitoring System (NSMS) which recognized that there was no adequate national nutrition surveillance system and proposed to institute one. An effective surveillance system should promptly identify nutritional needs; pinpoint, within narrow geographic boundaries, specific target groups with nutritional needs; predict future areas of nutritional concern; and provide data which Federal agencies can use to monitor the effectiveness of programs for various population groups. Current programs do not form an effective surveillance system for several reasons: (1) the systems are not always specific enough to identify problems by narrow geographic areas or do not always include important population groups, (2) the systems do not produce information in a timely manner, and (3) the systems do not provide information adequate for evaluating the effectiveness of programs designed to improve nutritional health. The proposed NSMS consists of four interrelated elements to determine nutritional and dietary status, nutritional quality of foods, dietary practices and knowledge, and the impact of nutrition intervention programs. There are four major areas of concern with the NSMS: lack of specificity and agreement between USDA and HEW; lack of agreement on the collaborative, decennial survey; the role of the system in program evaluation; and the inadequacy of the coordination mechanism. The Congress should designate either USDA or HEW as the lead agency for nutrition intelligence gathering, and an outside party should be selected to conduct an independent peer review of the program.

UPDATE:

The recommendations were accepted. In October 1981 the Department of Health and Human Services and USDA submitted to the Congress a joint implementation plan for a National Nutrition Monitoring System.

10. "Future of the National Nutrition Intelligence System" (CED-79-5, Nov. 7, 1978)

SUMMARY:

The United States does not have a unified or coordinated nutrition intelligence system, but both the Department of Health, Education, and Welfare and the Department of Agriculture have programs which provide some of this information.

With limitations, the existing programs provide periodic national population surveys to assess and monitor dietary and nutritional status of the entire population and selected groups at nutritional risk, surveillance at the community level for indicators of nutritional deficiency in selected high-risk groups, and evaluations of the dietary and nutritional impacts of some food assistance programs. While these activities generate useful information, there are weaknesses which limit their effectiveness as an overall system of nutrition intelligence.

Assessment and monitoring survey data are often untimely, or insufficiently specific geographically, omit important population groups, and are inadequate for evaluating programs designed to improve nutritional health. The surveillance mechanism is weak in terms of population group and geographic coverage and reliability data. A joint proposal by HEW and USDA for a comprehensive system of nutrition intelligence centers around four interrelated elements: nutritional and dietary status, nutritional quality of foods, dietary practices and knowledge, and impact of nutritional intervention. The system will function through recurring national surveys of the population, special surveys of nutritionally at-risk groups, expansion of existing surveillance programs, and studies to evaluate the nutrition intervention program. The system will operate through existing programs within each Department with a coordination mechanism at several levels. Areas of concern with the proposal involve lack of specificity and agreement between departments, lack of agreement on how a decennial survey would be conducted, the role of the system in program evaluation, and the adequacy of the coordination mechanism.

UPDATE:

The recommendations were accepted. In October 1981 the Department of Health and Human Services and USDA submitted to the Congress a joint implementation plan for a National Nutrition Monitoring System.

11. "Recommended Dietary Allowances: More Research and Better Food Guides Needed" (CED-78-169, Nov. 30, 1978)

SUMMARY:

Despite the importance of recommended dietary allowances in planning diets, evaluating nutritional contents of food, establishing guidelines for food labeling, and developing new food products, they have limitations and can be used properly only when these limitations and their meaning are understood. The recommended dietary allowances are considered to be too

complex for use by the consumer and are intended to be used by the professional nutritionist or dietitian. Although they provide a reasonable standard for use by nutrition professionals in planning and evaluating diets, a diet which provides the recommended dietary allowances does not necessarily ensure adequate nutrition.

Recommendations: The Secretaries of Agriculture and Health, Education, and Welfare should have the National Academy of Sciences assist in identifying nutrition research needs and in establishing research priorities relating to human nutritional requirements. This assessment should be used to improve and expand Federal research on human nutritional requirements. The Committee on Dietary Allowances should use the research results to expand and extend recommended dietary allowances to additional nutrients and direct them toward more specific population groups. The Secretaries should also request a qualified and respected body of experts to assist in the departmental planning efforts of developing food guides for the consumer to supplement other Government nutrition education efforts. These should help the consumer to develop diets that satisfy the recommended dietary allowances and nutrition guidelines and should address the current nutrition concerns regarding food components, lifestyle factors, and diet and health.

UPDATE:

Since issuance of the GAO report, the Food and Nutrition Board of the National Academy of Sciences has issued the ninth edition of the recommended dietary allowances. The new edition provides added coverage of some of the controversial food components which GAO reported needed more attention. The National Institutes of Health also funded a study by the Board to identify nutrition research needs related to nutrient requirements, as recommended by GAO. In February 1980, USDA and HEW issued dietary guidelines entitled "Nutrition and Your Health: Dietary Guidelines for Americans." These guidelines are the kinds of efforts that GAO recommended in the report.

12. "Greater Federal Efforts Are Needed To Improve Nutrition Education in U.S. Medical Schools" (CED-80-39, Jan. 2, 1980)

SUMMARY:

This report summarizes GAO testimony presented on November 8, 1979, before the Subcommittee on Nutrition, Senate Committee on Agriculture, Nutrition, and Forestry. GAO testified that despite its importance to health, nutrition is not taught adequately in many medical schools. GAO reported that the Bureau of Health Manpower, HEW, spent less than \$3 million for nutrition education grants to 13 schools of which 10 were medical schools.

Recommendations: The Administrator, Health Resources Administration, HEW, should:

- Evaluate the results of the Bureau's nutrition education grants.
- Set up several 3-year demonstration projects at interested medical schools to show how nutrition curriculums could be consolidated and emphasized.
- Make the results of the demonstration projects known and consider packaging a nutrition education program for other schools' use.
- Fund fellowships in the nutrition area and regional conferences of the Association of American Medical Colleges to discuss nutrition education.

UPDATE:

Since issuance of the report, the Secretary of Health, Education, and Welfare responded to GAO's recommendations and

- plans to evaluate the FY 1979 curriculum development grants in nutrition,
- will consider the development and funding of demonstration projects at medical schools to show how nutrition curriculums could be consolidated and emphasized, and
- will explore the possibility of providing additional funds for nutrition fellowships.

13. "What Foods Should Americans Eat? Better Information Needed on Nutritional Quality of Foods" (CED-80-68, Apr. 30, 1980)

SUMMARY:

Consumers, Government, industry, and others need better information on the nutritional value of foods. Currently there are no generally accepted nutrition principles and no authoritative guidance on what amounts are too much or too little of such controversial food substances as fat, cholesterol, salt, sugar, fiber, and alcohol, which have been linked to major diseases and disorders.

This report makes recommendations to the Secretaries of the Departments of Agriculture and Health, Education, and Welfare to provide such information to assist Americans in making decisions about nutrition and help reduce consumer confusion.

Food decisions are becoming increasingly difficult for consumers and Government to make due to the many thousands of food items to choose from, a changing lifestyle that generally requires consuming fewer calories, and a growing desire to select foods that promote good health.

UPDATE:

USDA listed a number of actions it is planning or taking in response to GAO's recommendations. USDA said it is developing menus to assist consumers in following the dietary guidelines. It is also publishing a second volume of "Food" for the public. USDA also said 50 percent of its 1980 research budget is directed at nutrient requirements. It will open a new nutrient composition laboratory in Maryland this summer. It has developed new analytical techniques on the iron content of beef, pork, and poultry. USDA is conducting research to develop standard values that could be used to calculate the nutrient content of foods for labeling. USDA said it is also developing proposed regulations on nutrient labeling of meat, poultry, and egg products.

The Department of Health and Human Services concurred in the concept of developing explicit and generally accepted nutrition principles and the need for outside scientific review of governmental guidelines on recommendations regarding dietary intakes. However, HHS said it never intended to establish recommended levels of intakes for individual classes of nutrients.

14. "Food Price Inflation in the United States and Other Countries" (CED-80-24, Dec. 18, 1979)

SUMMARY:

The report responds to a request for information on food price inflation in the United States, how food prices compare to those of other consumer goods and services, how food prices compare with those of other countries, and what other countries have done to combat food price inflation. Since 1972, food prices have risen an average of 9 percent a year and have increased faster than the general inflation rate. However, Americans are spending less of their disposable income on food while other goods and services such as housing and transportation have absorbed increasingly more of the consumer's disposable income. Although food prices in the United States are higher than they used to be, they have been the lowest among many developed countries. Many European countries attempt to stabilize their food prices through agricultural policies that generally keep farm prices high. These countries compensate for differences between their higher domestic prices and lower world prices for agricultural goods by subsidizing their farmers or by levying

taxes on cheaper imported goods. In the United States, increases in the costs of processing, packaging, transporting, and selling food have contributed heavily to higher food prices. Even though food prices in the United States are lower and rising less rapidly than in many other countries, opportunities to improve productivity and stabilize food costs in both the marketing and farm sectors should be sought.

15. "Maze of Food Regulations--Need for a Regulation Indexing System" (CED-80-44, Feb. 4, 1980)

SUMMARY:

Fourteen Federal agencies and commissions have issued 1,300 regulations for the transport of food, covering 9,752 sections of the Code of Federal Regulations. These regulations require some 30,000 separate actions to comply with the written law.

The difficulty of dealing with the web of regulations is compounded by the lack of an adequate index to determine which regulations apply in a particular situation.

To provide a means for locating applicable regulations, for analyzing regulatory overlap, and for better understanding the structure of Federal regulations, GAO recommends that the Regulatory Council, in conjunction with the General Services Administration's Office of the Federal Register, foster development of an indexing system. This system should permit easy identification of regulations pertaining to a specific subject, regulatory objective, and economic activity, and permit analysis of regulations to assess whether the sum of regulations in any specific area functions efficiently.

ORGANIZATIONS CONTACTEDFederal departments and agencies

Department of Agriculture
Science and Education Administration
Washington, D.C.

Department of Health and Human Services
Office of Health Information and Health Promotion
Nutrition Coordinating Committee
Food and Drug Administration
Washington, D.C.

Federal Trade Commission
Washington, D.C.

Office of Management and Budget
Washington, D.C.

Office of Science and Technology Policy
(Office of the President)
Washington, D.C.

Private companies

Borden, Inc.
Columbus, Ohio

General Foods Corporation
Washington, D.C.

Gerber
Fremont, Michigan

Giant Food, Inc.
Washington, D.C.

Good Housekeeping
New York, New York

Kellogg Company
Battle Creek, Michigan

Libby, McNeill, and Libby, Inc.
Chicago, Illinois

McDonald Corporation
Chicago, Illinois

National Broadcasting Company
New York, New York

Quaker Oats Company
Chicago, Illinois

Public Policy Forecasting, Inc.
Potomac, Maryland

Richard Manoff, Inc.
New York, New York

Stokely-Van Camp, Inc.
Indianapolis, Indiana

Professional and trade associations

Advertising Council
New York, New York

American Butter Institute-National Cheese Institute
Chicago, Illinois

American Council of Independent Laboratories, Inc.
Washington, D.C.

American Dental Association
Chicago, Illinois

American Dietetic Association
Chicago, Illinois

American Medical Association
Chicago, Illinois

American Society for Clinical Nutrition
Bethesda, Maryland

Canners League of California
Sacramento, California

Community Nutrition Institute
Washington, D.C.

Food Marketing Institute
Washington, D.C.

Grocery Manufacturers of America, Inc.
Washington, D.C.

Illinois Farm Bureau
Bloomington, Illinois

National Academy of Sciences (Food and Nutrition Board)
Washington, D.C.

National Food Processors Association
Washington, D.C.

National Meat Association
Washington, D.C.

National Restaurant Association
Washington, D.C.

Nutrition Foundation, Inc.
New York, New York

Nutrition Consortium, Inc.
Washington, D.C.

Society for Nutrition Education
Berkeley, California

Sugar Association
Washington, D.C.

Tuna Research Foundation
Washington, D.C.

Universities and affiliates

Frances Stern Nutrition Center
Boston, Massachusetts

Harbor-UCLA Medical Center
Torrance, California

Harvard University
Boston, Massachusetts

Michigan State University
East Lansing, Michigan

Stanford University
Stanford, California

Swanson Center for Nutrition
Omaha, Nebraska

University of Delaware
Newark, Delaware



UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

HUMAN RESOURCES
DIVISION

B-198417

APRIL 21, 1980

Hearing Clerk (HFA-305)
Food and Drug Administration
Room 4-65
5600 Fishers Lane
Rockville, Maryland 20857

Subject: Comments on Proposed Food-Labeling
Regulations (CED-80-89)

We have reviewed the food-labeling positions proposed by the Departments of Agriculture and Health, Education, and Welfare and the Federal Trade Commission in an advance notice of proposed rulemaking published in the Federal Register December 21, 1979 (Docket Number 78N-0158). We are providing our analysis of these proposals in response to the agencies' request for comments.

In the notice of proposed rulemaking, the agencies state that current food-labeling laws and regulations--established on a piecemeal basis over the last 74 years--are complex and sometimes duplicative and/or inconsistent. To correct this situation, the agencies set out to develop an overall labeling strategy that would give consumers the information they want and need to make informed food choices. The agencies intend to begin immediately implementing new regulations and drafting new laws, unless public comment presents compelling arguments or substantial new evidence against the proposals. The agencies expect their new labeling policies to be in full force within the next 2 years.

We commend the Federal agencies for their original objective of developing an overall food information strategy to improve the public's understanding about the food it buys and eats. We believe this project's objective, if met, will benefit the American public's diet and health.

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Our evaluation, however, indicates that the proposed regulations will fall short of the agencies' original objectives as they do not constitute a comprehensive strategy for informing the public about food and nutrition. We believe such a strategy should be developed before proposed food-labeling regulations are issued. Furthermore, this strategy should emphasize consumer education rather than industry regulation. While the agencies have generated needed debate and increased consumer awareness, more must be done. To succeed, the project must be accepted by everyone affected. For this reason, we believe the strategy should be developed cooperatively by the many parties with knowledge of food and nutrition.

NEED TO DEVELOP A MORE COMPREHENSIVE
STRATEGY TO INFORM THE PUBLIC ABOUT
FOOD

The Federal agencies' food-labeling proposals focus on providing consumers with information by requiring, through regulation, that certain data be printed on food labels. This approach is limited and does not carry out the agencies' original intentions to develop and implement a total food information strategy.

Our analysis indicates that development of a comprehensive strategy depends upon first determining:

- What information on diet is critical to proper health maintenance, product quality, consumer preference, and cost-effective food choices.
- What are the best methods to educate the consumer in effectively using this information.

Without an effective food information strategy that answers these questions, both industry and consumers will be short-changed: consumers will not have enough information to make informed choices, and industry may not be able to plan effectively for the future because it may not be certain of what is required.

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Originally the Federal agencies envisioned an overall strategy to improve the public's confidence and understanding about the food it buys and eats. Now, however, they support the piecemeal implementation of a series of regulations that require certain information to be placed on food labels without proper assurance the information is needed or can be used by consumers. It appears unlikely the agencies will be able to gain adequate support for their tentative positions on food labeling because their focus is too narrow and because of the adversary spirit that typically results from imposed regulations. Instead of mutual understanding and cooperation, an atmosphere of animosity and mistrust appears to be developing between Government regulators and the food industry. For example, industry and related associations have commented that:

- Proposed regulations have considered labeling of food products as the only way of communicating with consumers without clearly demonstrating that it is the best, most feasible, and cost-effective method.
- Consumers may not need or use all the information that the agencies want to require on food labels.
- Proposed regulations do not require that information be available for fresh meat and fruits and vegetables, alcohol, and food eaten in restaurants. Yet these foods account for over 50 percent of the money Americans spend on food.
- Economic impact and feasibility studies have not been performed. Regulations that encourage change in eating habits could have a bad impact on small businesses and farmers that grow certain crops. Also, costs could exceed proposed benefits. Many Americans are concerned about regulation impacts and want them assessed before changes are made.

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FOOD-LABELING PROPOSALS NEED INPUT FROM
AND COORDINATION WITH OTHER SOURCES

The Federal agencies have succeeded in generating needed debate and increasing consumer awareness about food. The recent publication "Dietary Guidelines" is an example of Agriculture and Health, Education, and Welfare's cooperating and taking initiative to coordinate data, research findings, and nutrition messages. Also, other agencies within the Departments, such as the Public Health Service, have developed material describing a range of education and information methods that the media, government, schools, private sector, health care systems, and others could use to improve our Nation's diet and health.

We commend the agencies for their initiative and spirit of cooperation in developing this range of information. But putting the strategy into use will require the agencies to go a step further. We believe that many sources--educators, consumers, and industry officials--must have a hand in implementing the food information strategy to assure its acceptance by the public, industry, and all others affected. Without participation by these groups, a comprehensive program to inform the public about food is not likely to be developed, much less implemented.

Like the United States, several foreign countries have developed dietary and nutritional goals aimed at encouraging changes in eating habits and improving the health of their citizens. One of the countries, Sweden, has established a 10-year diet and exercise program, developed by panels composed of national and local government representatives, educators, industry officials, and consumers. The main thrust of the program is education and national promotion directed at specific segments of the population. The Swedish Government has judged early results of the program as successful in improving consumer knowledge of nutrition and the health of the general population.

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CONCLUSIONS AND SUGGESTIONS

We believe that the Federal agencies' proposed food-labeling regulations should not be implemented at this time because they could result in information being placed on food labels that is not needed, used, or understood by most consumers. We are not advocating additional extensive research. Rather, we believe that existing knowledge and resources need to be brought together so that agreements and tradeoffs necessary to formulate a national food information policy or strategy can be reached and assessed.

One vehicle for formulating a national food policy would be a Presidential committee composed of members from Federal, State, and local governments; industry; consumer groups; trade associations; communication specialists, educators, researchers, and health professionals. This committee could provide guidelines to equip the consumer with useful and understandable information about food.


We believe the committee should do the following in formulating a national food policy:

- Establish and periodically update a nutrition and food data bank, through which inquiries could be made about food, nutrition, and health.
- Target information to all segments of the public, particularly those with special nutritional needs--the elderly, pregnant women, lactating mothers, children, etc. Some approaches are (1) food labeling, (2) school programs, (3) media advertisements, (4) reinforcement by the health professions, (5) point of sale leaflets, and (6) package inserts.
- Set interim and long-term goals and time frames for measuring accomplishments, adjusting approaches as needed. Market-test alternative information approaches and measure their effect.

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Thank you for the opportunity to respond to the food-labeling proposals. We hope our preliminary analysis and suggestions will be helpful to the agencies in finalizing their food-labeling regulations. If you have any questions about this letter, please call Mr. William E. Gahr, Senior Group Director, Community and Economic Development Division (202) 275-5525.



Gregory J. Ahart
Director



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-198417

November 7, 1980

The Honorable Michael Pertschuk
Chairman, Federal Trade Commission

Dear Mr. Pertschuk:

Subject: Comments on Food Advertising Proposals
(CED-81-27)

Thank you for the invitation to respond to the Commission's food advertising proposals published in the April 8, 1980, Federal Register (Docket No. 80-10617). The Commission is seeking comments and proposals on voluntary actions which might be undertaken by members of the food and advertising industries, the media, consumer representatives, and nutrition and health-care professionals to improve the flow of accurate and useful food information to consumers.

Providing information on food, whether it^{is} in the form of food advertising, school textbooks, food retailer pamphlets, or labels, involves an educational effort that requires cooperative action from many different public and private parties. Many Federal and local agencies, educators, food processors, retailers, and media experts are involved. For any one agency to determine the nature of this information without building a consensus among the involved parties tends to frustrate the educational effort.

Our ongoing review of food information programs has identified hundreds of programs and billions of dollars being spent in the public and private sectors to promote and supply information on food. The Departments of Agriculture and Health and Human Services, along with the Commission, are attempting to coordinate these efforts. However, as we discussed in earlier reports and as indicated in the recent National Agricultural Research and Extension Users Advisory Board annual report, national food information policy and strategy are inadequate. The lack of sequenced, organized, and coordinated information efforts has often confused the American consumer by providing conflicting and inconsistent data. Therefore, we believe

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that a more comprehensive strategy is needed to inform the public about food. We believe that all programs that provide food and nutrition information and education must act in concert.

While we believe the Commission has had an impact in this area, the issues that need to be addressed are too broad to be resolved within the Commission's legislative mandate and resource constraints. The Commission has obtained considerable information and expertise in its efforts to increase the flow of accurate and useful food information. Therefore, we encourage the Commission to continue current cooperative efforts to explore new approaches. Further, we believe the Commission needs to use its influence with the other executive agencies, the Congress, and others to expand current efforts to include the formulation of a mechanism to plan and implement a comprehensive national food information policy and strategy. Our views on what such a policy and strategy need to contain and our suggestions for developing them follow.

NEED FOR A NATIONAL FOOD AND NUTRITION
INFORMATION POLICY AND STRATEGY

The development of a food and nutrition strategy needs a broad base of inputs and support both from within and outside Government. Consumers must have accurate and useful information to make informed food choices. Without an effective policy for developing and a strategy for using this information, both industry and consumers will be shortchanged. Consumers will be confronted with conflicting data and inadequate information to make informed choices, and industry will not be able to plan effectively for the future.

Recently, primary Federal agencies interested in food and nutrition have cooperated and coordinated their activities. One example of cooperative effort is the publication of "Dietary Guidelines," a joint venture undertaken by the Departments of Agriculture and Health and Human Services (HHS). Further, Agriculture, HHS, and the Commission have worked together to propose new regulations concerned with information on food labels. Also, the Public Health Service has developed material describing a range of education and information methods that the media, Government, schools, the

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private sector, health-care systems, and others could use to improve the Nation's diet and health.

These efforts have brought us closer to a national food and nutrition policy, but interested parties outside Government need to be included in a broader dialog to better reflect competing interests.

CONCLUSIONS AND SUGGESTIONS

Because of the complexities and ramifications of the issues that need to be addressed, we believe that the Government, the food industry, consumers, food retailers, health-care specialists, the media, and educators need to work together in developing and implementing a coordinated, sequenced, and workable approach to the accumulation and dissemination of food and nutrition information. While bringing these groups together may create conflict, we believe that they could reach agreements and assess tradeoffs by pooling their knowledge and resources and sharing their concerns.

One mechanism that we believe could best accomplish the formation of a national food information policy would be a committee established by law to better ensure performance of policy objectives. The committee would be composed of members from the groups mentioned above. It could provide guidelines for organizing public and private resources to equip the consumer with useful and understandable information about food.

In a letter to the Food and Drug Administration on April 21, 1980, we suggested specific tasks that should be addressed by the proposed committee:

- Establish and periodically update a data bank, through which inquiries could be made about food, nutrition, and health.
- Target information through a variety of methods to all segments of the public, particularly those with special food needs--the elderly, pregnant women, lactating mothers, athletes, children, and others. Some approaches are (1) food labeling, (2) school

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programs, (3) media advertising, (4) reinforcement by the health professions, (5) point-of-sale leaflets, and (6) package inserts.

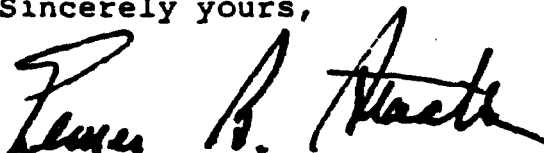
--Set goals and a sequenced time frame for measuring accomplishments and adjust approaches as needed. Market test alternative information approaches and measure their effects.

Our discussions with industry, trade associations, academia, and consumer representatives have revealed a willingness among these groups to cooperate with Government and each other in developing a food and nutrition information policy and strategy.

We are researching possible organization and funding aspects of the committee. Also, we are currently obtaining examples of methods employed by other countries to reach the necessary agreements and tradeoffs to formulate a national policy on food and nutrition information.

We hope our suggestions will be helpful to the Commission in finalizing its proposal. If you have any questions or would like to discuss this matter further, please contact Mr. William E. Gahr, Associate Director, Community and Economic Development Division (202) 275-5525.

Sincerely yours,



James B. Stacht
Comptroller General
of the United States

FEDERAL TRADE COMMISSION
WASHINGTON, D. C. 20580

BUREAU OF
CONSUMER PROTECTION

September 18, 1981

Gregory J. Ahart
Director, Human Resources Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Ahart:

We appreciate the opportunity to provide these comments on your draft report, "Informing the Public about Food -- Need for a Strategy for Improving Communications." The comments represent the views of the Division of Food and Drug Advertising and not necessarily those of the Commission. We have chosen to direct ourselves to two areas of broad concern and to four narrower issues that may suggest the need for revision.

We turn, first, to the essential recommendation of the draft report. In general, the draft advocates the development of a "National Food Information Strategy." It speaks to the desirability of a freshly coordinated governmental approach to combat apparently conflicting, confusing nutrition information that the public currently receives. The draft envisions a consortium of key federal government officials established to define the public's nutrition information needs and to harmonize and coordinate efforts to meet those needs. It also envisions an advisory board of industry members to provide input to this consortium.

We question what appears to be the fundamental premise on which these recommendations are based. That is, we question whether the federal government is capable of effectively undertaking the central and final responsibility for resolving the extremely complex areas involved, including issues such as what is scientific "truth" in the nutrition field, or what constitutes confusion or conflict in the nutrition information flow, or what steps must be taken to improve the nutrition information that the public receives. We recognize that the proposed National Food Information Advisory Board would provide a mechanism for other segments of the American food system to make known their views on these and other important issues; however, the charter reflected in the draft limiting the functions of this board to "advise and provide input" is inadequate. It fails to recognize the central role that the non-

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governmental sectors play in the development and dissemination of food and nutrition information and the need for these sectors, therefore, to be fully involved if an improvement in public awareness of the relationship between diet and health is to be achieved. Indeed, the failure to involve, among others, food industry representatives (producers, processors, retailers), nutrition professionals, and other health professionals as integral parts of a process to evaluate and change the mix of food and nutrition information poses the substantial risk that conflict and confusion will be aggravated rather than resolved.

Implicit in the failure to recommend a broadly constituted approach to these problems may be the notion that the federal government, as the primary decision maker, will be in a position to control the information flow and impose the consistency perceived to be lacking currently. If, indeed, this premise plays a role in the underpinning of these recommendations, we urge that it be rejected. Nutrition science is particularly dynamic with new scientific findings constantly emerging. Issues of interpretation are exceedingly complex, and the notion of the government acting as the arbiter in this area and mandating consistency in what information is disseminated is troublesome.

To the extent that the draft report voices concern that governmental programs in this area should be better managed, coordinated, and evaluated, we agree. The difficulty in ascertaining how much federal money is actually being spent on nutrition information programs may well reflect a lack of adequate coordination and evaluation of intra and interdepartmental efforts. However, our support for improving the federal government's management of its resources devoted to this area does not, as our comments above make clear, translate into support for federal management of nutrition information.

[GAO COMMENT: We agree that the Federal Government, by itself, would not be capable of effectively undertaking the central and final responsibility for resolving extremely complex issues. Our recommendation, therefore, is based on the premise that final responsibility for resolving these issues lies in the hands of society. The Federal Government will not be able to solve all of its problems alone, but as a representative of society and together with the food community, it can, through a consortium, begin to address those issues which society considers important and appropriate.

We also recognize the complexity of this issue. A greater degree of planning and organization is needed to effectively deal with complex issues and improve the management of Federal resources. Without a mechanism to help develop and focus rational and realistic plans and policies and to encourage open debate, each Federal agency could operate independently without a consistent strategy, thus increasing the possibility of duplication, confusion, and counterproductive work.

We recognize the critical role that nongovernmental sectors play in the development and dissemination of food and nutrition information and the need for them to be involved to improve overall effectiveness of food information activities. In fact, that is why we recommend that they have a visible, substantial role in providing input and advice to Government decisionmakers.

We recognize that nutrition is a new and changing science, with new knowledge constantly emerging. To benefit from this complex knowledge, we believe some institutional mechanism is needed to ensure that all interested parties have an opportunity to participate in making decisions and resolving issues dealing with science and society.]

Our second general area of concern is the failure to account adequately for the progress of a cooperative effort already underway that seeks to achieve many of the objectives that the draft advocates. The draft refers, briefly at pp. iv and 9, to an "FTC effort" to seek a voluntary approach on the issue of nutrition information. In fact, the effort is much more than a one agency project. While the FTC did serve a catalytic role in seeking to convene a group of representatives from the food system to promote a voluntary, cooperative approach to

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addressing food and nutrition information issues, the effort has progressed beyond the level reflected in the draft.

A Steering Committee met on June 4 and 5, 1981 to discuss prospects for improving public access to food and nutrition information in order to increase public awareness and understanding of the relationship between diet and health. The committee consisted of Richard Laster (Executive Vice President, General Foods Corp.), Carol Tucker Foreman (Former Assistant Secretary of Agriculture and current advisor to the Consumer Federation of America), Richard Manoff (President, Manoff International and Honorary Chairman, Geers, Gross, Inc.), Theodore Van Itallie (Nutrition Coordinator, Department of Health and Human Services), Joseph Signore (Executive Vice President, ITT-Continental Baking Co.), Donald Rothenberg (Director, California Food Policy Project), Freeman Bunn (Senior Vice President, Dancer, Fitzgerald, Sample, Inc.), Michael Pertschuk (Commissioner, Federal Trade Commission), Frank Morgan (Executive Vice President, Quaker Oats Co.), Joan Dye Gussow (Chairperson, Program in Nutrition, Columbia University), Donald Houston (Administrator, Food, Safety and Quality Service, USDA), John Prehn (Vice President, Safeway Stores, Inc.), Helen Ullrich (Executive Director, Society for Nutrition Education), and Howard Seltzer (Acting Director for Consumer Programs, U.S. Office of Consumer Affairs).

The Steering Committee came to a consensus on a proposal to form a voluntary organization which will include representation from all sectors of the American food system (producers, processors, consumers, nutrition and other health professionals, educators, retailers, communicators and government). The Committee decided that the organization's effort must center on the following principles: (1) information based on sound scientific knowledge; (2) use of both formal and informal education programs; (3) effective employment of a variety of communication and educational materials including the mass media, point of purchase materials, and the health care delivery system; (4) cooperation among a wide variety of organizations; and (5) continuity of effort over time.

Since June an interim executive committee has been preparing recommendations on program strategy, organization and funding. While these efforts are still in progress, it seems clear that the interim group will recommend that the new organization function at three interrelated levels. First, it should have a

Gregory J. Ahart

-4-

scientific data gathering and assessment function. Second, it should have a current nutrition information/education assessment function. Third, it should have a communications function. The ongoing deliberations of the interim committee obviously slice these areas into fine detail, but it would be inappropriate to discuss the issues further here until the full Steering Committee has considered them. The second meeting of the Committee has been scheduled for November 30/December 1, 1981 in Washington, D.C.

The purpose of explaining these cooperative efforts in some detail is to underscore the point made earlier about the need for a broadly constituted, as opposed to a federal government, approach to the problem at hand. It would also seem that the nascent council contemplates precisely the objectives which the draft report articulates. Therefore, we believe it ought to be accounted for more substantially in the draft.

[GAO COMMENT: We commend both the private and public sectors on promoting a voluntary, cooperative approach to addressing food and nutrition information issues. We agree that the council's initial objectives and operating principles are similar to the objectives we envisioned for the consortium and that they are a good start for establishing a broadly constituted approach toward solving our national food information problem. While we believe this is a substantial effort, we also believe that input from top policymakers within the administration and the Congress is needed to make it truly effective.]

As we indicated at the outset, there are also four specific items that we believe merit comment. First, the definition of "food information" (at p. 3) seems overly broad. In particular, the first element includes research on human nutrition, disease prevention, etc. It would seem that research activities per se are not food or nutrition information but are the raw material from which such information emanates.

[GAO COMMENT: We agree that research provides the basis for food information; therefore, we believe it is necessary for the scientific community to be strongly represented when food information policy is being formulated.]

Second, at pp. 5-6, the draft report states that massive federal monies are being spent on programs which provide food information, and the chart on page 6 suggests that a \$50 billion total provides the appropriate frame of reference. We suggest that these data -- which the chart's footnote states to be funding levels for entire food programs and not just funds related to food information activities -- needlessly exaggerate the level of the problem. As an illustration, at page 30 of the draft (Appendix II), it states that the Congressional Research Service determined that \$69 million was spent on nutrition education in FY 1976 whereas the chart on page 6 has inflated estimated FY 1980 expenditures for education to \$9.1 billion. While some funding increase from FY 1976 to 1980 may indeed have occurred, the use of an estimate 130 times larger than the 1976 figures creates an inaccurate impression about the magnitude of actual 1980 expenditures. To be sure, an effort to ascertain exactly how much the various departments and agencies of the federal government spend on food and nutrition information activities would be complex and time consuming. It is a necessary task, however, and one, we suggest, that the GAO may be in the most appropriate position to undertake.

[GAO COMMENT: We have changed the caption to state more accurately that funding sources reflect all Federal moneys spent on activities that directly or indirectly provide food information or otherwise influence food choices. We believe USDA's work to determine the amount spent on food activities should be continued.]

Third, we note an inaccuracy in the draft's characterization of the status of the food labeling proposals of USDA, HHS, and FTC (at pages iv and 9). The draft incorrectly states that these proposals were "withdrawn." In fact, while some proposals are being reconsidered, others are proceeding through the regulatory process. In any event, no proposals have been "withdrawn." The draft also inaccurately characterizes the three agencies' objectives in proposing these regulations. While the agencies recognized that food labels are an important source of food information for consumers (44 Fed. Reg. 75991), the agencies never stated that their proposals for revising food labeling regulations were the answers to the need to develop an overall food information strategy. The proposed regulations are directed at improving food labels; efforts to address the broader questions of the quality and quantity of food information must, as we have discussed above, be approached by different methods.

[GAO COMMENT: We revised the report to indicate that the proposals are being reconsidered. Testimony before the Congress by officials from the three agencies indicated that they intended to develop an overall strategy that would give consumers the information they wanted and needed for informed food choices.]

Finally, we are concerned about the limited dissemination of this draft report for comment. As we understand it, the draft has only been submitted to the Secretary of Agriculture, the Secretary of Health and Human Services, and to the Acting Chairman of the Federal Trade Commission. One of the draft report's central points is that the vast number of divergent programs within the federal government is a major problem, and the chart at page 6 indicates that all eleven executive departments and fifty agencies of the government are involved. We suggest that a substantially expanded opportunity for comment be provided so that these affected segments of the government can provide the benefit of their views.

[GAO COMMENT: We concur that it is important to obtain views and comments from many sources. In formulating this report, we obtained comments from persons from a wide spectrum of the food community. (See app. III.) Therefore, we believe that formal responses from those Federal agencies and/or departments that control the majority of Federal resources involved are sufficient.]

Again, we appreciate the opportunity to offer these comments. If you would like to clarify any of the views expressed or receive additional information, please contact me directly.

Sincerely,



W. Benjamin Fisherow
Acting Assistant Director for
Food and Drug Advertising



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Inspector General

Washington, D.C. 20201

21 SEP 1981

Mr. Gregory J. Ahart
Director, Human Resources
Division
United States General
Accounting Office
Washington, D.C. 20548

Dear Mr. Ahart:

The Secretary asked that I respond to your request for our comments on your draft report entitled, "Informing the Public about Food--Need for a Strategy for Improving Communication." The enclosed comments represent the tentative position of the Department and are subject to reevaluation when the final version of this report is received.

We appreciate the opportunity to comment on this draft report before its publication.

Sincerely yours,

Bryan Mitchell
For Richard P. Kusserow
Inspector General

Enclosure

COMMENTS OF THE DEPARTMENT OF HEALTH AND HUMAN SERVICES ON
THE GENERAL ACCOUNTING OFFICE'S DRAFT REPORT "INFORMING THE PUBLIC
ABOUT FOOD--NEED FOR A STRATEGY FOR IMPROVING COMMUNICATION"
DATED AUGUST 19, 1981

General Comments

The Department of Health and Human Services (HHS) recognizes the need which prompted the subject General Accounting Office (GAO) report and supports the intent to help improve the communication of food information to the public. We appreciate GAO's recognition that the Federal Government can provide leadership for informing consumers about food and nutrition. However, we take exception to several of the points raised in the GAO report. Four summary points are noted below, and more detailed comments are contained in the text which follows.

--Public confusion about food and nutrition is caused more from a variety of information sources than from contradictory messages in Government documents. It must be recalled that most nutrition information is produced and disseminated by industry--with a particular interest in one or another message--not by Government. Indeed, of the eleven documents cited in the report on page 10, only three were produced by executive branch agencies, and only two of the three--very nearly identical in their messages--were intended to provide comprehensive suggestions.

[GAO COMMENT: We agree that public confusion about food and nutrition is caused by a variety of contradictory messages coming from industry and sources other than the Federal Government. We also believe that Government regulatory and information activities contribute to this confusion. That is why we believe that all members of the food community need to work along with Government in establishing an overall food information strategy.]

--The best way to improve the quality of information is not necessarily the establishment of a White House level consortium of industry, interest groups and Government scientists. Such a body would duplicate the work of existing groups and also run the risk of enforcing premature resolution of scientific disputes.

[GAO COMMENT: In the report (p. 10) we point out that the Federal agencies have taken many steps to improve coordination and cooperation among the various sectors of the food community. While these activities are commendable and represent a genuine effort to improve the overall situation, the many devices for coordination lack a focal point that can provide leadership to all Government activities. We therefore believe that a consortium would not duplicate the work of existing groups but provide a means of drawing together and focusing the work of other groups.]

--Contrary to the implications inherent in the comparisons with other countries, food patterns in this country have been changing and in many respects in a direction consistent with better health. In the last 15 years, the consumption of foods with high levels of total fat, saturated fat, and cholesterol has declined by 15 percent or more. So, incidentally, has the rate of stroke deaths declined by nearly 40 percent and heart attack deaths by about 25 percent.

[GAO COMMENT: We did not mean to imply that food patterns in this country have not changed in the direction of better health. In fact, we are encouraged by the statistics quoted in the reply. Our study of other countries was to identify alternative strategy-development mechanisms that could provide insight in establishing a food information strategy. As stated in the report, we recognize the difficulty of comparing the United States with other countries because of social, political, and cultural differences, but believe we can learn from the experience of others.]

--We believe the best way to accomplish the intended objectives is through strengthening existing departmental and other governmental structures where policies compatible with overall food and health objectives are developed, and where policies can be more effectively translated into operational realities. There are several existing focal points in the Executive Branch for stimulating continued coordination and early collaboration: the Cabinet Council on Food and Agriculture, chaired by the Secretary of Agriculture; the Cabinet Council of Human Services, chaired by the Secretary of HHS; the Office of Science and Technology Policy, and the ad hoc HHS/USDA

Nutrition Working Group. The Department agrees that greater efforts are needed to encourage cooperation with the private sector regarding food, nutrition, and health.

[GAO COMMENT: We are encouraged that the Department agrees that more needs to be done to foster cooperation with the private sector. While the existing coordination attempts are commendable, we believe that an overall focus is needed to draw together the work of the other groups.]

GAO Recommendation

That the Secretaries of Agriculture and Health and Human Services and the Chairman of the Federal Trade Commission jointly develop and submit to concerned congressional committees and the President, for critique, a strategy for improving the communication of food information to the public which considers the views and ideas of the various food groups expressed in this report.

Department Comment

Although the Department recognizes the need which prompted this GAO report, and supports the intent to help improve the communication of food information to the public, we do not concur with the GAO recommendation.

In view of the complexities of coordination and early collaboration, we believe the best way to accomplish this strategy is through strengthening existing departmental structures and other governmental structures where policies can be more effectively translated into operational realities. We agree that a cooperative rather than a regulatory mechanism is needed concerning food information policy. We believe involvement of the private sector can best be enhanced by participation of States, academia, business, and industry at appropriate program levels of all operational components of the Departments instead of through the proposed consortium and advisory board. We also believe that the Office of Management and Budget should be included in the development of any interagency proposed strategy before it is presented to either congressional committees or the President. During a time of severe budget cuts, the expense of additional organizational structures should be carefully weighed.

[GAO COMMENT: We are encouraged that the Department recognizes the need to improve the communication of information to the public. The Department's proposal to strengthen existing departmental and other governmental structures to improve effectiveness has merit. However, this proposal lacks a focal point to draw together individual programs. We also believe the Office of Management and Budget should be included in the development of an interagency strategy.]

--National Food Information Policy

Because of its amorphous character, the term "National food information policy" as used in the report may hinder rather than facilitate coordination and understanding of the appropriate basis of assessment. Furthermore, in a Nation with a heterogeneous population with varied nutritional problems, needs, and socioeconomic backgrounds, only a wide range of "food information policies" can hope to achieve the desired results.

[GAO COMMENT: We encourage the Department to change our proposed "National Food Information Policy" to any title it believes will aid coordination and understanding. We also agree that this Nation has a heterogeneous population with varied nutritional needs and problems and that a wide range of policies will be needed to address the various population segments.]

--Nutrition Information Content

The report raises significant issues related to the content and dissemination of nutrition information. However, any improvements effected through the suggested GAO framework may not result in a noticeable impact on the dietary habits of most Americans. Those people who are already motivated to improve their diets would benefit most from the measures suggested. The assumption that improvements in nutritional information will result in widespread changes in nutrition behavior is not supportable. Concomitant efforts to influence consumer motivation to improve dietary habits may be necessary.

It must also be recognized that certain aspects of nutrition information, such as labeling of processed or packaged foods, remain predominantly a regulatory function. As an example, for members of the general public with chronic conditions such as heart disease, diabetes, stroke, and renal disease, knowledge of the salt, sugar, fat, cholesterol, etc., content of such foods is critical. In addition, for those concerned with weight reduction, a listing of the caloric value of each serving is essential. This facilitates individual dietary management when necessary. Such management is the responsibility of the family physician or professional nutritionist, and ultimately, the individual.

[GAO COMMENT: We agree that improvements in nutrition information may not always result in widespread changes in nutrition behavior. We also agree that an understanding of consumer behavior and motivation is important.

We recognize that certain aspects of nutrition information will remain a regulatory function. This regulatory function, however, must work with other policies and programs. As we pointed out in the report, failure to have an overall food information strategy has resulted in a piecemeal approach which is sometimes duplicative, conflicting, and confusing.]

--Concept of a Consortium

The concept of a consortium of Federal agencies, advised by a National Food Information Advisory Board, creates another dimension to the difficult sphere for obtaining professional consensus and adds layered complexity to the demands on coordination. HHS believes it is fallacious to think that we could achieve scientific agreement on all issues at any one time because new facts are always evolving and need to be debated.

Also, the report sets up unrealistic expectations for the proposed coordinating group and board. Controversial issues are likely to remain unresolved simply because the necessary scientific facts may not be available within a time period considered "reasonable" by the coordinators. A question which is not addressed is "who or what" will be considered the final authority. To whom would this consortium or committee be responsible? In the proposal, there are four distinct factors that contribute to overall food/ nutrition information: research, formal nutrition education, consumer information (food labeling), and consumer nutrition education. It will be important that these individual factors be considered in appointing a consortium for providing accurate and scientifically correct information to the general public.

Nutrition and food technology are emerging sciences. The knowledge is not finite but constantly changing due to more advanced research. Although updated information is available, the consumer is the ultimate user of the knowledge based upon education, buying power, and lifestyle. Establishing a national authority or board will not guarantee improved diets and/or health status.

[GAO COMMENT: Our purpose was to stimulate a broad-based discussion of food information decisionmaking and present some options on what Government can do to address problems of consistency and coherence. We recognize that many of these issues are highly controversial and that complete agreement cannot be obtained on all issues. We do believe, however, that a consortium could facilitate the scientific debate, the decisionmaking process, and the direction of food information efforts by providing a focus and forum for reaching consensus. We believe it is important that experts from the fields of science, medicine, nutrition, and others establish a plan to ensure that Federal resources are coordinated and spent in the areas of the most need.]



DEPARTMENT OF AGRICULTURE
OFFICE OF THE SECRETARY
WASHINGTON, D. C. 20250

October 9, 1981

Mr. Henry Eschwege, Director
Community and Economic Development Division
United States General Accounting Office
Washington, DC 20548

Dear Mr. Eschwege:

The enclosed correspondence is in response to your August 19, 1981, letter to Secretary Block regarding the GAO draft report "Informing the Public About Food--A Strategy for Improving Communication." The comments reflect input from the Human Nutrition Information Service, the Science and Education Administration and the Food Safety and Inspection Service.

We appreciate the opportunity to review this document and share our comments with you.

Sincerely yours,

A handwritten signature in cursive script that reads "Mary C. Jarratt".

MARY C. JARRATT
Assistant Secretary
for Food and Consumer Services

Enclosure

We appreciate the opportunity to provide our comments regarding the subject report.

Even though we agree that coordination of information regarding food can always be improved, we believe little new information or ideas are contained in the report and it tends to be superficial. We do agree that cooperation is far more important than regulation.

Departmental comments are noted below, with more technical comments following.

(1) Nutrition Information

The report implies that the federal agencies are responsible for the mixed signals the public is receiving. In the table on page 10 there are only two reports from federal agencies--Healthy People and the USDA-HHS Guidelines--and these reports are consistent. The federal agencies should not and cannot impose their position on the American Heart Association, the AMS, the National Academy, etc. We in the two major agencies--USDA and HHS--have in fact made considerable progress which should be recognized.

While charging government information to be misleading, the report itself misleads, oversimplifying several facets of nutrition education: the process of behavior modification of eating habits, the associated educational process through which individuals gain information and change behavior, and the process used to evaluate resultant change. The report also tends to be ambiguous, not defining the terms it generates. For instance, what is "a national food information strategy"?

[GAO COMMENT: Public confusion about food and nutrition is caused by a variety of messages coming from many sources. Government regulatory and information efforts contribute to this confusion. That is why we believe that all members of the food community need to work along with Government in establishing an overall food information strategy. Improvements in nutrition information should include an understanding of consumer behavior and motivation.]

(2) Interagency Coordination

In suggesting that coordination of food information dissemination across governmental agencies does not exist, the report presents a cursory look at the situation. The report does not recognize that progress has been made in message coordination both within and among agencies since 1977. In response to the Farm Bill of 1977, which established the U.S. Department of Agriculture as the lead agency in food and nutrition education, the Department and Extension Service cooperatively stepped up and expanded food and nutrition education efforts, interagency talks, and memorandums of agreement.

Apparently the report is based on selected older studies, predating 1977, which identified situations which have now been significantly improved. The references to food information dissemination in Sweden and the Netherlands, to the recommendations of the Reorganization Project, and to governmental coordination, all predate the period of 1977-81 when issues were examined and programs established to alleviate food information problems.

Intradepartmental and interdepartmental committees have functioned in the past to eliminate duplication and to focus on gaps in food information. The importance of such groups should be strengthened in the draft report.

[GAO COMMENT: On page 10, we identified and commended the Federal agencies for several steps taken in recent years to improve coordination and cooperation among the agencies and the sectors of the food community. Although the existing efforts are commendable, we believe that an overall focus is needed to draw together the work of the various activities.]

(3) Executive Level Consortium

The report implies that a strategy for improving the communication of food information through coordination will resolve these problems. It is doubtful that were a new group to be established, one with focus on political and economic interests, that it could adequately address nutrition information, which is largely a responsibility of the scientific community. Many reports, in fact, exist that cite sources outside of government as providing misleading information to the general public.

The report draws on a number of previous GAO reports documenting lack of coordination within the Federal government. While this was true three to five years ago, it is not true today. A focal point for leadership has been identified and is alive and functioning-- the Joint Subcommittee on Human Nutrition of FCCSET/OSTP. The mission of this group is to increase the overall effectiveness and productivity of research efforts in nutrition. Their responsibilities for nutrition research include improved planning, coordination, and communication among Federal agencies, the development of Federal research programs, the distribution of nutrition research information, and the preparation of reports.

The report weakens its argument for the establishment of a new type of coordination committee when it cites the examples of Sweden's and the Netherlands' efforts: what the report cites are problems the two countries have not been able to satisfactorily resolve and even new problems posed by the committee's actions. The report does not identify substantial benefits obtained from committee action.

[GAO NOTE: See our related comment at the end of this letter.]

(4) Extension Service

Surprisingly, the report does not recognize the unique contribution of the Extension Service to nutrition information dissemination, nutrition education, and nutrition research projects. The Extension Service has a unique staffing arrangement of professionals and paraprofessionals in all States, cooperating with the Federal government and trained to deliver food information appropriate to consumers, to coordinate community efforts, to document program impact, and then to communicate back to the Department the further food information needs of the consumers reached and the probable needs of consumers as yet unreached.

Also, in the past two years alone, Extension has carried to completion pilot research projects in nutrition education methodology in 17 states. Additional projects are now underway in 10 states.

Further, the nutrition programs of the Extension Service are supported by a strong research base in the Department and the Land-Grant Universities. Researchers and specialists contributing to the food information data base transmitted to consumers are experienced professionals in basic research techniques and program development. The active, much-respected Cooperative Extension programs are in direct contrast to the food information programs, which the report sees as inconsistent and mired in ineffective problem definition and solution and as common features of all such present government-originated programs.

[GAO COMMENT: We have recognized the significance of the Extension Service in other GAO reports. It does play a valuable role in educating the public. This particular report focuses more on the regulatory mechanisms to set food information policy rather than on the individual delivery mechanism.]

(5) The Human Nutrition Information Service (HNIS)

The establishment of this new agency, HNIS, which is dedicated to nutrition information is an important first step in highlighting USDA's role in nutrition education and information. This elevates the nutrition information activity in the Department to that of an independent agency. This is a first for the Federal Government. This action coincides with the administration's determination to provide the public with better nutrition information.

The three components of HNIS are the Consumer Nutrition Center, the Nutrition Information and Dietary Guidance Staff, the Food and Nutrition Information Center of the National Agriculture Library. Together, they account for food and dietary surveillance, food composition, nutrition education research, dietary guidance, and nutrition information, professional education, and bibliographic services.

(6) Food Information vs. Nutrition Information

The report seems to have confused "food" and "nutrition" information. GAO defines food information as "information including research on foods, educating consumers on these (food research) results, and communicating necessary (food) facts to implement knowledge gained to the general public (P.1). Prior to the definition of "food information," the report states "good diets are necessary to produce healthy and productive Americans". Utilization of nutrients from food/diet is the definition used for nutrition; this concept was not included in GAO's definition of food information.

Nutrition is a complex subject that is not really addressed by the GAO report. Americans want to know more about food because of its impact on health (i.e., use of nutrients by the body). It may be that a scientific/academic agreement on many nutrition concerns will never exist. Therefore, there is a need for a public health approach to nutrition that emphasizes points of scientific agreement, and an approach of "informed choice" in nutrition education. These concepts go far beyond the discussion covered in a GAO report and far beyond what could probably be accomplished by a high level Federal committee.

Food information cannot interchangeably be used with nutrition research, nutrition policy, nutrition information or food issues in many cases; yet it is so implied by the GAO report. The impression GAO wishes to make is that a national committee on "food information" will be able to resolve nutrition issues and thus resolve concerns on the safety, nutritional quality, and cost of food.

[GAO COMMENT: We recognize the complexity of this issue. A greater degree of planning and organization is needed to deal effectively with complex issues and improve the management of Federal resources. Without a mechanism to help develop and focus rational and realistic plans and policies and to encourage open debate, each Federal agency could otherwise operate independently from each other without a consistent strategy, thus increasing the possibility of duplication, confusion, and counterproductive efforts.

We recognize the critical role that nongovernmental sectors play in the development and dissemination of food and nutrition information and the need for them to be involved to improve overall effectiveness of food information efforts. In fact, that is why we recommend they have a visible and substantial role in providing input and advice to Government decisionmakers.

We recognize that nutrition is a new and changing science, with new knowledge constantly emerging. To benefit from this complex knowledge, we believe some institutional mechanism is needed to ensure that all interested parties have an opportunity to participate in making decisions and resolving issues dealing with science and society.]

(7) Delivery of Nutrition Information

The report seems to assume that food advertising and labeling are the ultimate routes to be used to provide high quality nutrition education. The Extension Service, which has a reputation since 1914 of providing excellent research-based nutrition information and education, does not consider food advertising and labeling regulations (and the resultant food ads and labels) as the main components of its food information delivery system, but as one set of tools among many others to teach food buymanship and food/nutrient selection.

[GAO COMMENT: We focused on food advertising and food labeling because they were major concerns of FDA, FTC, and USDA in recent years. They are only one set of highly visible tools among others to teach food buying and selection.]

Summary

The Department appreciates the fact that GAO recognizes the leadership role government can provide when informing the public about food and nutrition. Although we do agree that coordination of information regarding food can always be improved, the Department does not concur with the GAO recommendation to develop a consortium of Federal agencies advised by a National Food Information Advisory Board. We believe that the goal of improved nutrition information communication and cooperation can best be achieved by strengthening existing Departmental and interdepartmental structures. We feel that the mission of the executive level Joint Subcommittee on Human Nutrition Research could be expanded to implement several of the GAO recommendations.

The progress which has been made in areas of food information and nutrition education and their impact on health status in the United States should be recognized. Consideration should be given to the fact that the public confusion about food and nutrition is the function of numerous information sources rather than contradictory information released by the government. We would encourage realistic expectations to be set for any coordinating group, remembering that scientific agreement will probably not be reached on many controversial issues as new evidence continually appears and is debated.

[GAO COMMENT: Our report does not exclude the option of revising existing programs to achieve a coordinated food information policy. Expanding the responsibility of an existing committee, such as the OSTP Joint Subcommittee on Human Nutrition Research or some other committee, to include a role as a central point for organizing multiagency activities and considering private sector input and then submitting plans to the President and the Congress, would be consistent with our recommendation.]

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