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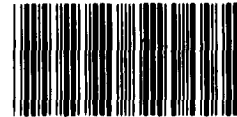


COMPTROLLER GENERAL OF THE UNITED STATES  
WASHINGTON, D.C. 20548

B-198417

November 7, 1980

The Honorable Michael Pertschuk  
Chairman, Federal Trade Commission



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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<sup>4</sup> 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

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

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

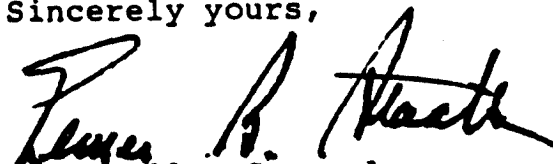
--Set goals and a sequenced time frame for measuring accomplishments and adjust approaches as needed. Market test alternative information approaches and measure their effects.

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. Heath  
Comptroller General  
of the United States