



American Society for Nutrition
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July 10, 2025

Dockets Management Staff (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket No. FDA-2024-N-2910, Food Labeling: Front-of-Package Nutrition Information

To Whom It May Concern,

The American Society for Nutrition (ASN) appreciates the opportunity to comment on “Food Labeling: Front-of-Package Nutrition Information.” Established in 1928, ASN is a not-for-profit organization dedicated to the mission of advancing the science, education, and practice of nutrition. ASN has more than 8,000 members around the world, working throughout government, clinical practice, academia, and industry, to conduct research to achieve the ASN vision of “A Healthier World Through Evidence-Based Nutrition.” ASN supports the agency’s proposed rule to require **Front-of-Package Nutrition Labeling (FOPNL)** on most packaged foods.

Key points from ASN's response below include:

- **Consumer Benefit:** FOPNL will help shoppers and consumers quickly assess product healthfulness, compare items, and make informed decisions.
- **Support for FDA’s Consumer Testing Research:** ASN appreciates the FDA’s rigorous consumer testing efforts and encourages further evaluation of how consumers use and interpret FOPNL, especially the meaning of *medium* levels of nutrients.
- **Call for a Robust Consumer Education Campaign,** particularly through healthcare providers and nutrition educators, to explain (1) FOPNL, (2) the importance of limiting foods high in certain nutrients, and (3) how to use the full Nutrition Facts label. ASN offers to assist in developing and disseminating these materials.
- **Ongoing Research Needed:** ASN recommends continuous study of FOPNL’s impact on consumer behavior, diets, and public health once implemented, and how the new FOPNL interacts with other front-of-package symbols.

Updating food labeling, including FOPNL, to reflect the most up-to-date evidence on nutrition recommendations and health outcomes will help consumers identify healthier foods and follow more nutritious dietary patterns, which could help to lower the alarmingly high rates of nutrition-related chronic diseases currently found in the U.S. Chronic diseases such as heart disease, cancer, and diabetes are the leading causes of death and disability and the leading drivers of the nation's annual health care costs, and many are preventable through proper nutrition and physical

activity.¹

The FOPNL proposed by the FDA would clearly label key nutrients to limit found in the Scientific Report of the 2025 Dietary Guidelines Advisory Committee²: **added sugars, saturated fat, and sodium**, using the terms *high, medium, and low*. Many individuals consume more than the recommended intakes of these nutrients which can contribute to increased energy intake without providing nutritive benefit, leading to excess weight gain and increasing the risk for obesity and nutrition-related chronic diseases.

The prevalence of diet-related chronic conditions is also high among children and adolescents. For that reason, the FDA should prioritize establishing Daily Reference Values (DRVs) and percent Daily Values (DVs) for children under four and then consider expanding the FOPNL rule at a later date to include products marketed to children 4 years of age and below, once DRVs and DVs for that population are available.

The proposed FOPNL would be mandatory, placed on the front of most foods bearing a Nutrition Facts label. Some estimates have stated that over 70% of foods sold at grocery outlets are processed foods, meaning they would bear a FOPNL³. Having the information on the front-of-package will allow consumers to more quickly and easily identify the healthfulness of packaged foods, make comparisons among food products, and make more informed purchasing decisions. The 2024 International Food Information Council (IFIC) Food and Health Survey⁴ found that 66% of adult consumers were trying to limit their sugar consumption, with 49% of those trying to improve their diet in general and 42% trying to avoid weight gain and prevent a future health condition. Of those who were trying to limit or avoid sugars in their diet, added sugars were most likely to be the target of these efforts. Further, half of Americans were trying to limit or avoid sodium and 44% were trying to limit or avoid saturated fat. Highlighting the relative level of these nutrients on FOPNL will likely make it easier for consumers interested in cutting back on those nutrients to determine which products are high or low in them.

The proposed FOPNL is interpretive, which has been found to be more helpful for consumers, because interpretive labels can better assist consumers to understand the numbers on the Nutrition Facts panel in the context of a total daily diet. While the Nutrition Facts label is an important tool for helping consumers select healthy foods, only 63% of adults understand how to interpret the % Daily Value and only 57% know how to tell when a food is “high” in a nutrient using the Nutrition Facts Label, with lower rates among those with less education⁵. IFIC consumer research on FOPNL conducted in 2024 indicates that the use of interpretive language

¹ U.S. Centers for Disease Control and Prevention. <https://www.cdc.gov/chronic-disease/about/index.html>

² 2025 Dietary Guidelines Advisory Committee. 2024. Scientific Report of the 2025 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and Secretary of Agriculture. U.S. Department of Health and Human Services. <https://doi.org/10.52570/DGAC2025>

³ Ravandi, B., Ispirova, G., Sebek, M., et al. Prevalence of processed foods in major US grocery stores. *Nat Food* 6, 296–308 (2025). <https://doi.org/10.1038/s43016-024-01095-7>

⁴ International Food Information Council. 2024 Food & Health Survey. June 20, 2024. <https://foodinsight.org/2024-food-health-survey/>

⁵ Lando A, Verrill L, Wu F. FDA’s Food Safety and Nutrition Survey: 2019. U.S. Food and Drug Administration. March 2021. <https://www.fda.gov/media/146532/download?attachment>

(e.g., stating when nutrients are high, medium, and low) on labels helps consumers to correctly identify the “least healthy” option when selecting among various options⁶.

We support FDA’s proposal that including information about beneficial “nutrients to get enough of” (e.g., dietary fiber, vitamin D, calcium, iron, and potassium) on FOPNL could increase consumer confusion and not allow consumers to correctly identify the “least healthy” option when selecting among various options. FDA’s focus groups found that participants were confused by the inclusion of both nutrients to limit and nutrients to get enough of in the same FOP scheme. Additionally, many food packages already have information about the product, such as nutrient content claims (e.g., “good source of Vitamin D”), on the front of packages as well.

ASN applauds the consumer testing that the FDA has conducted to date on FOPNL and recommends that the FDA assess current usage of the Nutrition Facts Label prior to and after implementation of the FOPNL to monitor and evaluate changes in the usage of the Nutrition Facts Label, if any, with the introduction of FOPNL. While the FOPNL can help consumers make quick comparisons among products to determine which is least healthy, only use of the full Nutrition Facts label will help consumers truly understand the healthfulness and nutrient density of a product. FDA should also conduct additional research to better understand how consumers interpret *medium* levels of nutrients in FOPNL, since *high* or *low* may be easier to interpret. ASN also recommends additional research to better understand consumer decision making and to monitor usage of all label schemes when FOPNL and a healthy symbol are both present on the front of packages, along with the Nutrition Facts label on the back of packages. Ongoing research is needed to better discern if and how FOPNL contributes to improved diet quality and overall health or lowers risk of diet-related diseases.

Comprehensive consumer education is of utmost importance to accompany FDA’s FOPNL, and ASN urges FDA to include a consumer education campaign to help consumers best understand the addition of FOPNL, including why these nutrients should be limited and how to make informed healthful purchasing decisions, as well as to continue to emphasize the importance of the Nutrition Facts Label. It would be beneficial for the FDA to collaborate with partner organizations, including scientific societies such as ASN, to help educate consumers on FOPNL. ASN would be pleased to help disseminate information and participate in such a consumer education campaign as a partner organization. Our reach includes health care providers who will be invaluable in encouraging consumers to better understand healthy food choices and eating patterns. It may also be useful to have multiple education campaigns targeted at various stakeholders, such as participants and providers of governmental and charitable food assistance programs. This may include a direct campaign for consumers, as well as a campaign to educate nutrition and health care professionals.

Thank you for considering ASN’s comments on “Food Labeling: Front-of-Package Nutrition Information.” In conclusion, ASN supports mandatory FOPNL as a tool to promote healthier eating and is committed to partnering with the FDA in implementation, research and education efforts. ASN commends the Agency’s efforts to improve public health with labeling changes that

⁶ International Food Information Council. Front-of-Package (FOP) Nutrition Labeling: Front & Center Food Information to Encourage Healthy Choices. May 24, 2024. <https://foodinsight.org/front-ofpackage-fop/>

will help consumers make more informed food choices for themselves and their families. Please contact Sarah Ohlhorst, MS, RD, ASN Chief Science Policy Officer (240-428-3647; sohlhorst@nutrition.org) if ASN may provide additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Naïma Moustaid-Moussa". The signature is fluid and cursive, with a long horizontal stroke at the end.

Naïma Moustaid-Moussa, PhD
2025-2026 President, American Society for Nutrition

