

# Horizontal Approaches to Food Standards of Identity Modernization 9/27/19

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FOOD AND DRUG ADMINISTRATION (FDA) PUBLIC MEETING  
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MODERNIZATION

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P R O C E E D I N G S

SIMULTANEOUS BREAKOUT SESSIONS BLOCK #2

CONSUMER EXPECTATIONS OF STANDARDIZED FOODS

MS. CARLTON: Hello, everybody. Can you hear me well? Okay. Great. Thank you for coming. It's wonderful to see you here. This is our second session on consumer expectations, and it will last an hour and a half. And after the session, there will be a break.

I would like to introduce our team. We are going to moderate today's session. And we have a note taker. My name is Ewa Carlton, and I'm a consumer scientist. I do consumer research for FDA.

MS. VELEZ: I'm Megan Velez. I'm the acting director of the Office of Regulations and Policy at CFSAN.

MS. BRADBARD: Hi. I'm Steve Bradbard. I'm the director of the consumer studies team in CFSAN.

MS. HUDSON: Hello. My name is Sonia Hudson. I'm a consumer safety officer in the Office of Nutrition and Food Labelling.

MS. CARLTON: Thank you for introducing yourself. And I don't think we have enough time to let everyone here to introduce themselves, but I just would like a quick show of hands. I would like to find out is there anybody here from the industry? Please show -- raise your hand. Wonderful. What about public health organizations? Great. Consumer representatives? Okay. Media? Uh-huh. Any other affiliations?

MR. BRADBARD: (Off mic)

MS. CARLTON: Great. Thank you. Thank you. Wonderful. So, we have a great mix of people in the room. Wonderful. And this breakout session, we'll discuss issues related to consumer expectations and standardized foods. And we want to learn about consumers' shifting expectations and how changes to broad categories of foods could allow innovation and product reformulation to meet such demands.

As standards of identity are issued to "promote honesty and fair dealing in all the interest of consumers", we believe that consumer perspective is important to understanding what flexibility we should consider when exploring horizontal changes to current

standards of identity and invite comments on limitations that are appropriate to ensure that these standards continue to meet consumer expectations.

And as a reminder, what we mean by horizontal changes are the changes that could be made across different standards of identity, so across categories of standardized foods.

And I wanted to emphasize that any references that we are making here or any comments or anything like that are not endorsement of FDA or -- are not endorsement of FDA during this meeting and that the ideas that are proposed here are just to generate discussion and to hear from everybody and to hear everybody's input.

And we have several ground rules and they are also posted on this chart here. So, we have a microphone. So, Megan will pass the microphone to anyone who wants to speak. And before you speak, please introduce yourself and tell us your affiliation. And any idea -- we welcome any idea and please share your ideas here with us.

It's okay to have different opinions. We welcome different opinions. There are no wrong or right answers here, so. And we appreciate all the ideas that we hear. However, we may need to parking lot something in order to kind of move on with our questions. So, if that happens, we'll just put this on a piece of paper and go back to it at a later time.

And we -- as facilitators, we are not here to answer questions. We are here to get input from you, to hear from you. So, this is a chance for you to provide your comments. So, we are mostly -- we mostly want to give you this time, so an opportunity. And..

MS. VELEZ: So just a quick reminder too. So, I know this was mentioned during the plenary session, but this session is being recorded for a transcript. So that will be available on the public meeting website in the future.

MS. CARLTON: Yes. And I mentioned before, we're also taking notes. And Steve will be also kind of capturing the main ideas that are coming up on the flip chart. And then we'll put it here on the wall so we can refer to it and then we can summarize at the end of our session.

So, I will -- well, without further delay, I'm going to move to our questions. And our first questions are about your awareness -- actually, your knowledge of consumer awareness of food standardization, of standardized foods. Do you -- could you share with you (sic) what you know about to what extent consumers are aware of standards of identity for foods?

MR. BRADBARD: Or how much it influences them, another angle. How important it is and how it should influence (Inaudible response).

MS. BOOREN: Betsy Booren, GMA. Just talking -- the sample size was incredibly small, but I would say we have done some baseline consumer work that indicates that the general public may or may not understand, one, that they are standards; and even if they did, whether they thought they were appropriate.

And so, we've seen some consumer work that we've put in the field, where, if there was a standard associated with the product, it didn't at times matter to them. And that was product specific.

But again, that was a very small sample size for a very small segment of one or two products. But what it raised to us or gave us credence to is the broad understanding by consumers -- it may not be there -- or as the food industry associates standards of identity, they see things differently.

MS. CARLTON: Okay. Wonderful. Thank you for your comment. Anybody else? Anybody else has anything to share with us about what you know about what is consumer awareness of standards of identity? Maybe you have any knowledge of -- if there are any specific foods or food categories that consumers know that are standardized?

MR. BAUER: Hi. I'm Bob Bauer with the Association of Food Industries. I'm taking a different slant actually. I know this is about consumers, but the industry benefits as well because our consumers use a couple of our products. They only hear bad things. They'll see something in the news about "there is no FDA standard for this product and 90 percent of what you buy is adulterated."

So, it can work in the opposite way and industry can benefit in a couple of areas. We've

repeatedly filed for standards of identity that FDA hasn't acted on. And we've even known there's been industry consensus in scientific -- in Codex and all things.

So, I know this is about consumers, but the industry angle I think ties in with that too, because if there was a standard, the industry could help police itself and educate consumers about the standard that's now in place.

MS. CARLTON: Okay, thank you. Thank you. There was here a lady in front. She raised her hand. Thank you.

MS. PERCEL: Yvette Percel, USDA Dairy Programs. From my experience, I don't think that most consumers are aware of standards. I actually was doing a butter review and I went to some of the leading supermarkets. And just asked questions: "Well, why did you buy this butter? What made you choose this butter over this butter?"

And the answers I received were "Oh, the color." "That's what my grandmother used." "The price." So that clearly tells me that they're not aware of standards. And some of the questions that we receive at USDA tells me that they are not aware of standards also.

MS. CARLTON: Okay. Thank you.

MS. FLETCHER: Hi. I'm Dr. Arnetta Fletcher, program director for Nutrition and Dietetics at Shepherd University. I'm also a registered dietician and I conduct what's called nutritional assessments in a small rural community.

I currently work now to kind of identify needs, interests, knowledge in terms of what these individuals know. I can confirm having some experience working for food industry that there is a very significant gap in terms of consumer awareness and their understanding of what standards exist and how they are translated into not only the different -- the more traditional grocery products, but the products that are also geared towards fitness or geared towards certain specialties.

And so, I conduct work on several different levels. I do work with school nutrition, veterans, all individuals that are within the general population. And so, we're seeing -- we're just seeing a phenomenal gap in terms of what different consumers know, so.



MR. BRADBARD: Could you just describe a little bit more about that gap? You've mentioned a couple of times there's a significant gap in terms of what consumers know.

MS. FLETCHER: Yeah. And so just some of the findings that I've been able to look into is gaps in terms of what a traditional product is considered and how that sort of translates to these future food trends and innovation of new food products.

MS. CARLTON: Okay. Thank you. Thank you so much.

MR. GOGGI: Speaking -- sorry, Peter Goggi, Tea Association of the USA. But I was in the consumer products business for over 30 years.

Speaking qualitatively, I think not only do consumers generally not know standards of identity, but in many instances, they don't even know what the product is. So, for example, if you asked a consumer "Mayonnaise" -- "what goes in mayonnaise?" 99 percent couldn't tell you what -- that there's only three ingredients in mayonnaise.

Or in our particular instance, if you say the word "tea," generationally it's actually very different. If you're a Baby Boomer or Greatest Generation, they will generally refer to black tea. But if you are a Millennial or Gen Z, anything that's hot in a beverage or anything that's iced is tea.

So, I think that there's significant gaps both in the awareness of standards of identity and even what the product is that they're buying.

MS. CARLTON: That's wonderful. Thank you.

MR. YOUNG: Hi. Zack Young (ph) with Lidl, U.S. And to kind of piggyback on that. Like mayo -- I think some of the more plant-based products that have come out I think of like nut-based milks or vegetable protein products get captured in the mainstream media. So, we see a -- we see kind of these -- "Is it meat or non-meat?" What do we want to call it?" Those types of things get caught in media, but not the majority of SOIs.

MS. CARLTON: I don't know. Did you like -- did you introduce your affiliation? I don't know if I got it.

MR. YOUNG: Yeah. Lidl, U.S.

MS. CARLTON: Okay, thank you. Thank you.

MR. YOUNG: You're welcome.

MS. CARLTON: Thank you. Wonderful. Okay.

Anything else here to add? So, I hear from all those different responses that for the big part consumers are not aware of existing standards of identity.

Let me ask you from a different angle. Do you think that consumers have some kind of -- like a sense that somehow foods are, you know, standardized, that they do have some kind of, you know, designation? Do you have any feel of that that this is...

MR. BRADBARD: They may have knowledge (inaudible response), but there is an umbrella (ph). And different consumers know that there is --

MS. CARLTON: Yeah.

MR. BRADBARD: -- frameworks, you know. Maybe not called standards of identity.

MS. CARLTON: Or if not, what would be important to -- for consumers to know about standards of identity?

MR. BRADBARD: We'll be asking about that later in the Guide (ph) 2. So, we'll not...

MS. CARLTON: Sure. So, we can just...

MR. BRADBARD: We'll see your answer is after the next (inaudible response).

MS. CARLTON: Yes. Now, I would like to move to another question that is nutrition related. And the question is: What nutrition or dietary goals are important to consumers?

And to give you some kind of an idea, example, it's like, for example, reducing or increasing certain nutrient or things like that. In terms of nutrition or dietary goals or health goals...

MS. WEBSTER: I'm Alli Webster. Sorry to interrupt. I'm with the International Food Information Council. We have some research on this from our food and health survey. In our 2019 iteration of the survey, we found that reducing sugar intake was the number one thing that people are doing to improve their diets. I think around 80 percent of people who said that they were trying to improve their diets said that that was how they were doing so. So, sugar is clearly on the brain for a lot of people.

And in terms of health goals that they're looking out for, it's things like -- weight loss and weight management continually is number one for people, followed by things like cardiovascular health and having just general energy. Sometimes cancer prevention is in there as well, but by and large, the number one option was always weight loss and weight management.

MS. CARLTON: So, do you think that those goals are somehow related to standards of identity? Or like in what way could they be related to standards of identity?

MS. WEBSTER: You know, I'm not sure about that totally. I mean, obviously, reducing sugar intake in products as it relates to sugar identity would -- or sugar content in standards of identity would be important for individuals. But I am with the other people that spoke up already saying that most consumers I don't think are aware of those things. They can read on a package that it is reduced sugar, but most people generally don't know what that means, that it has an actual legal definition.

MS. CARLTON: Okay.

MR. BRADBARD: But do you think horizontal standards that would allow for a decreased sugar intake could then promote them to the goal of decreasing sugar, which consumers have told you.

MS. WEBSTER: Yeah.

MR. BRADBARD: Is it important (inaudible response)?

MS. CARLTON: Yes. Anybody else? Oh, yes, here. Thank you.

MR. GOGGI: Yeah, I'll also piggyback. Peter Goggi, Tea Association. I think that consumers seek out foods and beverages for specific reasons, whether it's taste, whether it's health. But there's a definitive reason for them to buy what they buy. And in many instances, it's not the standard of identity, but a claim that might be made around that.

So, for example, if you allowed a horizontal move for reduced sugar from the standard of identity of that product, the consumer is going to be driven by the reduced sugar claim, not by the standard of identity whether they know it or not.

So any type of claim whether I'm on a keto diet or, you know, I'm allergic to gluten or whatever, they're seeking products out that meet that need, either no wheat products or this is fortified or this has vitamin D or this has folic acid, this is -- so it's about not the standard of identity itself, but about the claim that's around on the label that may or may not support the -- you know, it will be different from the SOI.

MS. CARLTON: Yeah. So, what kind of aspects, characteristics of foods or food categories are relating more to standards of identity since you said that this one might not be as directly related?

MR. GOGGI: Is that to me or to the...

MS. CARLTON: Is this -- yes, you or anyone...

MR. GOGGI: But I think there are some categories -- I think there are some categories -- or I think a good example is wherever you see something where pure is kind of question. So, there was a honey issue a few years ago, pure honey, what makes up honey. I think there is issues around vegetable oils, what's pure -- extra virgin olive oil versus virgin olive oil or whatever.

So, I think that there may be an understanding that there's standards associated with that. But they're hearing about the negative side. Somebody mentioned it before. It's about -- when it's violative and this stuff has, you know, canola oil in it instead of extra virgin olive oil, this is bad. So, they know that there is something about that definition, but I don't think they can put their fingers on it.

MS. CARLTON: Uh-huh. Anybody else on those characteristics that are important to consumers that are related to standards of identity?

MS. JACK: Maia Jack, American Beverage Association. I think this takes us back to the morning presentations.

MS. CARLTON: Yes.

MS. JACK: And again, I believe I heard in there and -- which is the case that -- the nutrient content claims, building on the comment that was just made. The nutrient content claim is a form of horizontal application to standards of identity. So that does help

with consumer understanding.

So whatever changes that ultimately do get made, we would have to ensure they're accompanied with appropriate consumer disclosures. What that looks like will be determined soon I suppose. And we're working on providing suggestions on what that may be.

MS. CARLTON: Uh-huh. So, what we've heard here that the nutrient claims are related to standards of identity and they should be understood across the product categories. Is that what you...

MR. BRADBARD: So, it's kind of like an almost an indirect effect of the standard of identity that it allows the product to make a nutrient claim or a better claim...

MS. JACK: Extension of the (inaudible response).

MR. BRADBARD: Right.

MS. JACK: The nutrient content claim (inaudible response) and it's extending out.

MR. BRADBARD: Right. And that...

MS. JACK: So that the new food -- sorry. The nutrient content claim is an extension to the standards.

MR. BRADBARD: Right.

MS. JACK: So, the new food is still standardized.

MR. BRADBARD: Right.

MS. JACK: But the appropriate disclosures accompany that claim.

MR. BRADBARD: And that could help consumers meet their nutritional guides or goals.

MS. JACK: It's an indicator to the consumer --

MR. BRADBARD: Yeah.

MS. JACK: -- right?

MS. CARLTON: Okay. Yes. Any other aspects of foods that matter to consumers and that are related to standards of identity? Does anyone else have any input here?

What changes specific or otherwise can -- could FDA make to standards of identity to better reflect those nutrition, health and dietary goals of consumers? Maybe for any specific products or product categories that somebody would like to talk about those possible changes

that FDA could make?

So, let me rephrase it. So when you think about consumers, when you think about their needs, their goals and standards of identity, is there any other aspect that you would like to provide your comment to to kind of address any -- we may not have asked directly about that, but what are the consumer concerns and how could they be addressed, if at all?

Okay. So, let's move to the next one. Thank you for your input here. And then -- and now I would like to talk more about the attributes of standardized foods. And what attributes, which attributes do you think -- of standardized foods you think are important to consumers?

MR. BRADBARD: I guess (inaudible response) what the -- what do you -- when you think about food attributes, what do you think about? What comes to mind -- so what -- tell me what you think are attributes, what comes to mind? And are they important when it comes to what Ewa just mentioned?

MS. CARLTON: And this what we've heard here about consumers wanting to lower the sugar intake. That's what I hear. And what about other nutrients? I mean, we can have examples. I'm just going to throw some examples. Like fiber content or calorie count that was already mentioned. Or anything along that lines -- these lines?

MS. VELEZ: I guess just to ask this maybe a slightly different way. So, I think -- we have received I think a number of, you know, different ideas at FDA about how we can modernize standards. And I think the one thing I think hearing from everyone that there's a general recognition that consumers don't know that foods or certain foods are standardized. But there also seems on the flip to be: if you change something about a standardized food that doesn't meet the consumer expectations, they know.

I'm so just curious I think asking it again a slightly different way: Are there certain things about standardized foods that you think if we change that -- is it an ingredient, is it a manufacturing process -- that really again wouldn't meet consumer expectations?

MR. DETLEFSEN: On one of the other breakout session papers it talks about taking milk fat out -- milk

fat requirements out of the standard -- yeah, Clay Detlefsen, National Milk Producers Federation.

So, they talked about taking milk fat out of those standardized -- standards of identity. Ice cream without cream in it, I got to think that consumers' expectations are not going to be met. So, I think that's, you know, a real problem. Plus, there are ways to do that already. You can make a product called mellorine. It's basically ice cream without the milk fat and you put in vegetable fat.

Or you could throw the name frozen dairy dessert. You pretty much have the freedom to do whatever you wanted. I bet you if most consumers saw that frozen dairy dessert and knew it contained vegetable oils instead of milk fat, it probably wouldn't meet their expectations either.

MS. CARLTON: Thank you. Any other opinions here?

MS. WASSERMAN: I feel like I should respond. I'm Debra Wasserman of the Vegetarian Resource Group. Sorry. I wasn't going to say a word. But -- and consumers are smart. And I think the rate of innovation today -- the reason why a lot of the non-dairy alternatives are succeeding is taste and they like it.

So, I think you can't use the statement "then people would be fooled by it or whatever." I mean, maybe it's a generational thing, because if you ask anyone under the age of 40, they would not know if an ice cream had cream in it or not. So that's my opinion.

MS. CARLTON: Thank you.

MR. BRADBARD: So, Debra, just what you said, getting back to the attribute, so what's the attribute we're talking about here in terms of the horizontal standard?

MS. WASSERMAN: Well, I'd say our audience is looking at food labels and looking whether they see the product is being healthy.

MR. BRADBARD: If you...

MS. WASSERMAN: And everyone's definition of healthy in the entire human population greatly varies. It depends on each person's individual health needs.

MS. CARLTON: Thank you.

MS. MCGILL: Hi. Kelley McGill, Harvard Law School. And I would say that everyone that I've ever spoken to, you know, other consumers, no one is aware of what a standard of identity is or that they even exist. So, I would say, you know, based on my perspective most people choose foods based on the use of them or the role that they fill.

So, they look to labels and names such as, you know, ice cream or cheese or sausage, words like that to show a consumer how it should be used. And then they have additional information like nutritional facts and ingredient statements to show them what is in it.

So, for ice cream or a frozen dairy dessert product, either way that that's labeled, the consumer can still flip around that pint of ice cream and see exactly what's in it. They can see whether it's cream or they can see whether it's vegetable oils or some other product.

So, I would say the attribute is the role in the kitchen or the dining room that that food is supposed to play as a key one.

MS. CARLTON: That's great. Thank you.

MR. BRADBARD: And what is it about the ice cream -- when that -- what is the attribute about the ice cream that you were talking about before that makes it so that you wouldn't want it to (inaudible response)?

MR. DETLEFSEN: I mean, I just got to think. If you're calling something ice cream, the second word is cream.

MR. BRADBARD: Okay. Okay. All right.

MS. BOOREN: Betsy Booren, GMA. I'm going to take it from just a little different angle here.

MS. CARLTON: Yeah.

MS. BOOREN: I think -- I work with a whole bunch of people that are working for a trade organization that have never worked in the food industry before. So, when we have conversations like this about standards of identity, it's very interesting to talk to them and get their perspective.

And one of the things that they've helped me think through on this if there is an expectation of having a standard of identity that creates a fair playing field to have at a federal level that will implicitly



impact consumers' expectations, because when they go into a grocery store, they believe things are being regulated to a point and that leads to their expectation of the product.

So, I think there's a level of this of consumers may not know exactly what's going on, but I think they are savvy enough to know "this is what we expect." And there is a component of just the business end of standards of identity that automatically feeds into expectations because it's provided to them in a clear consistent fashion, which is a different way of talking about this, which cannot be minimized in my opinion.

That's part of the reason we're here and that ties into some other aspects. But part of having that standard gives them a level of expectation because they're seeing consistent fair products regardless of what state they're produced in or what city or what type.

MS. CARLTON: So, what I hear is that this might be just the method of terminology that, you know, we call it here standards of identity. But really how this can be translated into consumer language is consumer expectations and what consumers are supposed to -- are expecting to get when they see a product under a given name and...

MS. LOVERA: Hi. My name is Patty Lovera. I work for an advocacy group called Food and Water Watch. And I agree that consumers -- we don't know. I think there's many different types of consumers and we don't know what they all think. And quite frankly, I think that's on you all to do -- on FDA to get at the bottom of some of this before we start changing these standards. I think there's going to be ripple effects, because I think there's -- I think there are generational differences for sure.

You know, our membership skew is older, that's who joins advocacy groups. But when there is any news item about something not meeting some kind of consumer expectation, it really hits people I think above a certain age, probably 40, as an economic issue. And it really hinges around kind of like the emotional baggage around fillers, right, like, "I think I'm buying this and instead this thing is taking up space. And maybe it's

taking up space to provide fiber and maybe it's taking up space because sugar took up more space than the artificial sweetener that's being used instead." But it's perceived as a diminishment in quality by some consumers.

So, I think there's a lot to figure out here before we start changing these standards. And I also think for some set of consumers -- and I don't think it's the majority -- but for some kind of overachiever label readers, these standards of identity are a backstop, like, "At least I know it's that. At least I know it's cheddar cheese. It's not got X, Y or Z, other" -- a perception of a filler or an additive or a coloring or something else.

Like I think some people are using -- and I don't think it's the majority -- but I think some people are using these standards of identity as a shortcut for a short ingredient list, which really motivates a lot of people. And that's a growing set of people, I think.

So, I think you all have a lot of work to do to figure out what the baseline knowledge is before we assume, we're improving it with some change.

MS. CARLTON: Wonderful. Thank you.

MS. BOOREN: And I'll add on to this. Betsy from GMA. Or help -- if you're struggling to make decisions about some of this, what are the specific research questions that if people want to help field -- to provide you that information, providing some of that -- what you need for the type of information would be helpful.

Because we all work with consumers in a variety of ways and getting more clarity about what would help inform your decision process in managing consumer expectations would be helpful.

MS. CARLTON: Yeah. These are exactly the type of things we want to hear, like, what do you know about your consumers. And please share it with us.

For example, among some of the comments to the docket that we received, consumers demand healthier foods. And some examples that were provided included demand for lower sodium products or other products that meet specific dietary needs like gluten-free. And somebody mentioned that.

So, what do you think about these examples? Do

they bring anything from your own experience from what you hear from your consumers? Here.

MR. GOGGI: Peter Goggi, Tea Association. So, I'll talk about tea because I happen to have some figures just on why people buy a tea product. So, our figures show in a recent audit that 48 percent drink tea for thirst quenching, 47 percent to relax, 38 percent for its antioxidant's polyphenolic material, 25 percent for an energy boost, and 17 percent as a digestive aid. So obviously, it adds up to more than 100 because people have multiple reasons for drinking tea.

But the point is you have one product and you have seven, you know, drivers of liking in that product. And I'm sure that that is true in almost any food or beverage category that people buy. So, there is different reasons and it could be layered. It's not one; it could be three.

MS. CARLTON: Do you see any of the characteristics that would kind of stretch across different food categories? You mentioned tea. But what about expanding those into a group of product categories?

MS. BOOREN: You mentioned low sodium.

MS. CARLTON: Yes.

MS. BOOREN: And that can be across the board in any product. Have you thought about how to compensate for iodine when there is low sodium across the board?

MS. CARLTON: Well, this is a great question. And I would actually want to hear from the audience here like would you be able to address this question?

MR. YOUNG: I think -- Zack Young, again, Lidl U.S. I think what's interesting about this one with iodine is the fact that salt has been pushed more towards non-iodized salt in consumers' behavior. So, from -- you know, whether it's food programming or, you know, using sea salt in place of what we've added iodine to, I think is also a good driver of that. So, we use sea salt now as a selling point for products where it doesn't have it in -- doesn't have that mineral in it. So that's our nutrient in it. So that becomes just an interesting point on top of this.

MS. CARLTON: Okay. Good. Thank you. Any other examples of nutrients or dietary needs that may relate to

consumer expectations and to meet their goals? So, I think we're going to move to the next question unless there is anything else to add. I don't see any hands.

So, our question four is: Are there changes to certain standardized foods -- categories of standardized foods or attributes of standardized foods that would make it, so the product no longer meets consumer expectations? So basically, do you see any possible changes that could be -- that either happened or could happen to certain standardized foods that would make these -- this product or these products no longer meet expectations of consumers? And what I think -- the example of --

MR. BRADBARD: Ice cream.

MS. CARLTON: -- ice cream was one that would kind of answer this question. But do we have any other examples?

MR. BRADBARD: I think we also heard that it would not meet the expectations of some consumers, possibly other consumers (inaudible response), so.

MR. YOUNG: I think the ice cream -- Zack Young, again, Lidl, U.S. I think the ice cream is a great example, where, if it said just vanilla ice cream on the front pack and you didn't have to have any other disclaimers on the front. The expectation -- if you pick up one and its plant-based or you pick up one and it's dairy-based, you have to turn around the pack and look at the ingredient deck.

I do think consumers are getting smarter and doing that. But I think in general we hear about the complaints, not the, "Oh, I picked this up and it wasn't what I expected, and it was good." You only hear the negative effect of "I picked something up and it's not what I expected. It's not labeled as I expected it to be." So, it's trying to figure out that balance of what maybe is acceptable and what's unacceptable in the consumer eye.

MS. CARLTON: Okay. So, we're going back to those consumer expectations here. And -- okay, please.

MS. McGill: Yeah. Kelley McGill, Harvard Law School. Just to build off that, I think that can help consumers across the range. Making sure that those qualifiers are there, can serve a really useful function

of pairing both: the role that a consumer is being told it plays -- you know, ice cream, like dish it into a bowl, have a scoop of it -- and their expectation for what it is.

So, I think commonly now we see, you know, things like plant-based or soy or coconut ice cream and then the consumer is told what it is on the front of the package as well as how to use it. I think those two things can ensure that both consumer expectations are met, and they're being informed, you know, on both sides of the package what it is that they're consuming.

MS. DURGAN: Okay. Chelsea Durgan, FDA. Just as I'm sitting here listening, there seems to be a lot of talk about names, qualifiers, the words on the labeling and perhaps representing the standardized food to consumers even if they don't understand that there are standards and the food is standardized.

But I'm wondering -- and this really is a question: Are we placing too much emphasis on the words? Are there other things about the product that are represented to the consumer such as the location in the store or the packaging? Like just myself as a consumer, when I go and buy milk at the store, I don't look for m-i-l-k. I look for that like translucent jug that has white liquid in it in a certain spot in the store. I'm wondering if there are other factors like that that are conveying the product to the consumer.

MS. RIVERA: Hi. Allison Rivera with the National Cattlemen's Beef Association. I think a prime example of that is the plant-based products being right next to the beef in the case. That's a prime example. And again, we want to make sure that consumers understand the amount of protein that they're getting. A lot of people, probably some in this room, are trying to eat high protein diets. And so, these are a lot of concerns that our producers have.

MS. CARLTON: Okay. Great. Any other examples?

MS. MANU: Nicole Manu, The Good Food Institute. Going off of that, even when there are plant-based meat products next to conventional meat products in the same case, they're still labeled as plant-based making it clear to consumers what they're getting.

And to go off of that, I -- as important it is to get certain nutrients, for protein, for example, American consumers are not low in protein. Studies show that American consumers get enough protein. So that shouldn't be a big concern at all.

MS. CARLTON: Wonderful. Thank you. Anybody else? Any other examples? Yeah, please don't be afraid. It's a good forum to express your opinion. So, I encourage anyone to participate.

MS. McGill: Kelley McGill, Harvard Law School. Just to go off the point about placement, there are also consumers who may choose different diets for a variety of reasons. And so those consumers who may be seeking, you know, plant-based meats or whatever to just go off of that example, they may be seeking those for a variety of reasons. So, having them actually next to the conventional products can help those consumers.

So, both sides of the equation, you know, can be seen, that as long -- I think one of the primary should be that it's clearly labeled in a way that consumers understand what they're eating as well as how to use that product. Yeah.

MS. CARLTON: Okay. Wonderful. Any other example? So maybe an example of a product -- maybe anyone has an example of a product that no longer meets consumer expectations, or a category of products?

MR. BRADBARD: I missed that. I'm sorry, what was that?

MS. CARLTON: Any categories of standardized products that do not meet consumer expectations and why would that be? What will be those products? Other examples that were provided -- because, you know, we got some here, like we got plant-based, we got dairy, ice cream, we got plant-based meats. Do we have any other examples that would give us a picture of when consumers' needs or expectations would not be met?

Please don't be afraid to offer your opinions. I mean, anything is good, any opinion matters here. So, I welcome a variety. So, anybody who hasn't said anything yet maybe. Or maybe you would just like to say something that even I'm not asking about, but something that you want to share related to this.

MR. DETLEFSEN: Clay Detlefsen, National Milk Producers Federation. I think absence claims on food products where they never have the potential to have, you know, whatever --

MS. CARLTON: Yes.

MR. DETLEFSEN: -- attribute is being talked about. So, you know, gluten free salt, non-GMO this. If you can't possibly have a -- GMO that. Because the consumers' expectations are that that product is somehow different and, in all likelihood, that product is somehow better. So, the gluten-free salt is much, much better than regular salt.

MS. CARLTON: Yes, yes, that was a great example. Anybody else? Any other aspects whether it's different claims or product placement or ingredients or claims for absence of ingredients or nutrient claims or things like that. Does anyone have any other input here? There are no wrong responses. Just please share what your experiences are.

So, I'm thinking maybe the way we ask this question is very kind of targeted, but if I could ask it more -- open it up a little bit so you could share your concerns in this area. Do you have anything else to add? It doesn't have to be so specific, so.

MR. BRADBARD: Like horizontal are fine, but don't touch my...

MR. DETLEFSEN: Clyde Detlefsen, National Milk Producers Federation. Consumers might not realize that a lot of foods are standardized, but what they do understand is they're getting a quality product. And I think the standards of identity basically ensure that that is a good quality product that's in the marketplace.

They don't have to worry about whether FDA has a rule about what's in it. They just recognize that ice cream, you know, is a good quality product whether I get this brand or that brand.

MS. CARLTON: So, what does this...

MR. DETLEFSEN: And it's because the standard of identity is there to ensure the consumer is getting what they want.

MS. CARLTON: Yes. And what's behind that quality? What would you say? What does quality mean to a

consumer?

MR. DETLEFSEN: I think good quality ingredients -- good ingredients.

MS. CARLTON: Okay. Yes. Anybody has anything else to add in response to this or to illustrate your experience? Okay. So, I think we can move to the next question. I don't see any other raised hands.

So next question relates to data, consumer data. And I wanted to ask you are you aware or you know about any data that are needed for FDA to evaluate and consider consumer expectations? Would you like us to know about any reports, studies that have been done that would be worth considering?

MS. WEBSTER: Alli Webster, International Food Information Council. I guess I'll just put in a plug for our consumer research. Many of you might be familiar with our food and health survey, which we've done I think for the past 14 years, which has a lot of information on consumer perceptions around nutrition, food safety, what have you. And I think a lot of that interfaces directly with the standards of identity conversation.

And then we've also done quite recently several studies that relate also. We did one recently on comparisons between plant versus animal-based milk products and if consumers are able to accurately identify which is which.

We did find something kind of interesting in that by and large people are, you know, mostly able to identify that soymilk does not have cow's milk in it. But there's a certain percentage of the population that did not get that right.

So, there is some miscommunication or misperceptions out there in a certain number of the population. So, there is information to glean from those types of surveys.

And then I'm not sure how things like sustainability or the environmental impact relates to standards of identity, but we also have consumer information on how that relates to their nutrition and health goals as well.

MS. CARLTON: Okay. Wonderful. Thank you. That was one example. Anyone else has any examples? Or do you



know of any data, reports, any research that you would like FDA to know about?

MR. YOUNG: Zack Young, Lidl, U.S. There is the Consumer Food Safety Education Group, an organization that may be a resource with some information. Their main topics are obviously on food safety, but they also do -- kind of branch out into quality and other aspects as it pertains to the consumer and food. So, Shelley Feist is the leader of that group.

MR. BRADBARD: I'm sorry, Consumer Food Safety..

MR. YOUNG: Education.

MR. BRADBARD: Group.

MS. CARLTON: Group.

MR. YOUNG: Yeah. I don't think group is on the end. But it's -- that's -- it's an organization that does that. So, they do a conference every other year. But -- are a group that meets regularly.

MS. CARLTON: Okay. Wonderful, wonderful. Any other examples? Any other data sources that you would like FDA to consider? Or maybe, you know, about any data collection currently being conducted that is relevant to standards of identity? Okay. I don't see any raised hands, so I think we can move to the next question.

MR. BRADBARD: The good news is the morning session didn't have any more.

MS. CARLTON: Some overlapped.

MR. BRADBARD: Some overlapped.

MS. CARLTON: Yes. So, if FDA creates horizontal flexibility to allow manufacturers to use new manufacturing processes or add or substitute ingredients, what information beyond that currently required by regulation are conveyed to consumers?

So, to rephrase it, in a situation when FDA creates this horizontal flexibility allowing changes, how would that -- beyond what's currently required by regulation, how could that be communicated to consumers?

MR. BRADBARD: Do you think that it's even important to give public information and education if FDA makes changes to its standards of identity? Is it important for people to know, if so, what should they know?

MR. GOGGI: So, I think the ultimate knowing is

probably kind of to the side. It's more about -- the purpose of a standard of identity is to create a fair and even playing field and also to provide consumer confidence that they're buying the product that they think they're buying. So, it's more of a -- you have to prevent the knock-on effect of: if you allow the standards of identity to be changed or add ingredients, you still need to guarantee that the consumer is getting what they think they're getting.

You know, it's about expectation and the product meeting that expectation. So, it's really about: if you're going to alter the standards of identity or allow them to be modified, you can't allow the integrity of the product to decline or the consumer perception not to be met. Is that clear? Probably not.

MS. CARLTON: Yes, that's -- that was very clear.

MS. WEBSTER: I just have an opinion and maybe it's a common one or at least one that several people are thinking about. Allie Webster with IFIC again. When we think about standards of identity around dairy products like milk or yogurt and thinking about how plant-based is now a big part of that market, one of the things that people like myself as a dietician think about is that these products are not nutritionally equivalent. And that if we do open up the standards of identity to, you know, be open to those plant-based alternatives, making sure that the public is aware that things like protein, vitamin content, fat content are very different. I think that's a critical need and one that I'm not sure is currently being met.

MS. CARLTON: Thank you. Yes.

MS. VELEZ: So, can I ask a question just to build on that? So, when you say the need is not currently being met, so would you think the information provided in the nutrition facts label is not sufficient to communicate that? Or do you have a suggestion again for how that information should be conveyed if standards are modernized in a way that would allow for those products?

MS. WEBSTER: Yeah. There could be data that I'm not familiar with. I would refute what I'm about to say. But I think that many people don't necessarily look at

the nutritional facts panel when they're thinking of their milk alternatives. They're saying, "Oh, great, this is rice milk. You know, it's gluten free. It's, you know, a dairy alternative. I'm going to use this." Or they're not necessarily looking at the protein content. They're just assuming that it will meet their needs.

MS. CARLTON: Okay.

MS. JACK: Maia Jack, American Beverage Association. So just to piggyback on what everyone is saying I think, which is appropriate consumer disclosures should be made with any horizontal changes. That's number one.

And number two: This is the first time I hear someone bring up the term integrity, nutritional integrity. And in fact, it's a terminology that should probably be better defined. We would not want it to suggest that there should be no change to the nutritional profile, but that an improvement to the nutritional profile would still retain the integrity of that product. So just questioning how you might want to define integrity.

MS. CARLTON: And, you know, if you could clarify? So how -- what will be your understanding of integrity?

MS. JACK: Sugar reductions, for example. So, if you have the standards of identity and if there's a horizontal permission to allow for sugar reductions in juices, for example, the nutritional profile of that product has improved and therefore the integrity is still intact.

MS. CARLTON: Okay. Thank you.

MR. DETLEFSEN: One concern I have -- just throwing an example out here. Ketchup. I don't know if there's a standard of identity for it. I suppose there is. But when I go to the grocery store, I don't sit there and look at the nutrition facts panel. I don't look at the ingredient statement to see what's in there. I see a ketchup bottle.

And, you know, I may have a brand preference or not, but I don't have to think a lot about it. I don't -- if you start tinkering with the standards of identity, I don't want to have to start reading every single piece of

information on a package in order to do my shopping. I'll be in the grocery store for 4 hours every time. So, I think we have to make sure that very quickly that product meets the consumers' expectations. You have to preserve that at all costs.

MS. CARLTON: Thank you.

MS. MCGILL: I think a couple of points. Kelley McGill of Harvard Law School. A couple of points to that. First, is that if a consumer buys a product that they, you know, didn't end up enjoying or it didn't meet their expectations, they always have the choice not to continue buying it. And I think that's a -- that the free market is an important quality stop, so that if a company is commonly promulgating a low-quality product, that consumers may choose not to purchase it again.

And then for consumers that do have particular or specialized dietary needs, I think those consumers are generally -- you know, speaking from experience and from those around me, those consumers are familiar with and commonly do read nutritional information if they have special needs that they're concerned about meeting.

And I think it's important to point out this point, that standards of identity were initially promulgated far before the nutritional information education act and before nutrition facts and ingredient statements were required on packages. So, they were initially established to ensure consumers that they were getting an unadulterated product and were being dealt with honestly and fairly.

I think nowadays that information having nutritional facts, having ingredient statements helps provide consumers with enough information to choose for themselves the products that meet their protein needs, that meet their vitamin needs.

And I think we should ensure that any labeling communicates clearly to consumers both what they're buying as well as how to use that, including names for products on -- you know, that have been a traditional part that may have newer innovative alternatives.

MS. CARLTON: So just maybe to follow up on what you said. So, what will be the consequences of what you said to modernization of standards of identity? And

anybody else also.

MS. MCGILL: I think I'm -- I'm not even -- I'm not advocating a change in policy. I think what -- a colleague of mine will specify a little bit more on this in his oral comment this afternoon. But what -- our perspective is, is that FDA doesn't need to change any existing policy around the use of qualifiers for already standardized foods.

So independent of other changes that might be made horizontally to those standards -- for non-standardized foods, FDA has a current and longstanding practice of not enforcing against the use of qualifiers like soy to milk that help consumers understand what it is. And we would just advocate continuing that practice as well as providing clarification to the industry to reduce any uncertainty that might be hindering innovation.

MR. BRADBARD: So, you're describing a pretty competent consumer, as you said, they -- also they have the option to not purchase the product again if they don't like it. So, you said information to industry. What, though, do you think if anything is needed in the way of communication to consumers if a new product now makes it into a group of products that it couldn't previously use the name for? The consumers -- usually consumers need to understand there's been a horizontal change, something has happened, and if so, how do you communicate that?

MS. MCGILL: I think they would have to understand first that there was something that was changed. So, I think we've heard from a number of different people today that consumers aren't generally familiar, at least to the extent of my knowledge, with standards of identity.

So consuming -- so to communicate a change in the standard of identity process to consumers when they don't already know what standard of identity is, could lead to increased consumer confusion in my opinion. You know, I might be wrong. But it seems then there would have to be a fairly ambitious educational campaign if you then wanted to lay that groundwork of knowledge about standards of identity.

And at this point, it may be more valuable to focus on looking at the role that -- as we're doing right now in this conversation, looking at the role that standards of identity have evolved into paying -- that might be different from what it was originally used for before nutrition facts, before ingredient statements.

In other words, to respond more directly to your question: Are standards of identity still something that are being used as a proxy and do consumers understand what they are? If they are, the question of: Should they be communicated? A change in them becomes a very real one.

But if they don't know about them and are -- instead are relying on, you know, names as -- you know, commonly used names and descriptors of content as well as on use rather than as a standardized thing as in -- if standards of identity are playing a different role than they historically did, then communicating information about how those standards have changed may not be as useful because they may not understand them as such.

MS. CARLTON: Okay. And I think we had somebody over there. Yes. Thank you.

MS. FLETCHER: Hi. Dr. Arnetta Fletcher again from Shepherd University. I could kind of piggyback off of the comment about raising awareness for consumer education. And I think that there are, especially from the academic side, plenty of opportunities for those that are dietitians especially and those that pursue public health research and consumer nutrition or community nutrition research to raise awareness of these different label changes.

I know that there's quite a few universities that have partnered with industry to start to translate and kind of disseminate this information to the community. From a federal level, I know that there are plenty of partnerships in terms of academia where these opportunities present themselves.

And so, while standards of identity, for example, may not be recognized as a term, there are certainly a slew of different strategies that can be used to disseminate that information without having to use this specific terminology.

And so I guess another way to address consumer education and whether or not they do know, I would prefer or I guess consider that there's additional research that's done not only on what consumers know, but what efforts are already underway that's kind of looking into this area. Because I know that there's just a handful of us there -- I mean, there's quite a few of us that do help promote understanding and kind of reduce any barriers to using or understanding different elements of the food label.

MS. CARLTON: Okay. Great. Thank you. Okay, there's some...

MS. LOVERA: Hi. Patty Lovera from Food and Water Watch. I just want to be clear from a consumer perspective. I mean, consumers are confused and it's not their fault they're confused, because they are navigating a ridiculous marketplace of competing labels, and quite frankly, a lack of enforcement about a lot of claims.

So, when -- if the standards of identity are changed, just because they are confused about whether or not to use them is not an excuse not to tell the public that they changed. If these change, people have to know about it and they have to know about it in a way that is more accessible than a notice in the Federal Register, which normal human beings don't read and you shouldn't have to. You shouldn't have to read the Federal Register to shop and get the information you need and make the choices and get what you think you're getting, right? And that's where we are with food labels. Like it is a nightmare and it stresses people out.

So, to answer your question, we have to educate people that there have been changes because people are also creatures of habit. And if they have been buying "fill in the blank" food to not pick a fight about a particular food product, but they've been buying food X for 20 years because they thought about it once and they liked that you can't have this additive or you can't do this thing, and that changes somehow, even if it changes for the motivation of improving its nutrition, people deserve to know that. And that shouldn't be optional. It should be a part of this process.

MS. CARLTON: Okay. Great. Thank you. So, yeah,

if there -- no more hands raised. I just would like to open it up now. Yes?

MS. LOVERA: Can I just say one more thing?

MS. CARLTON: Of course.

MS. LOVERA: It's similar to my comment before, but -- so I think there's this question about labeling here and how does labeling relate to standards and what does that do. There's a lot of comments about -- and especially here, from over here -- what labeling can do and, you know, the information that it does provide like nutrition facts, ingredients names.

But then there's also comments that I think really get at -- the point here is: How is the labeling actually used? Just because it can convey that information, are consumers taking in that information?

So, I think this goes back to the ketchup example that the gentleman in the back provided. So, I think that's a really big question here that it will be good to have information about. Is it the words on the label? We know they are there. We know they can be provided. Perhaps even more could be provided. But is that what's really conveying the nature of the food, the identity of the food to consumers in practice?

MS. CARLTON: Okay.

MR. BRADBARD: It's more complex -- do the words on the label actually convey the identity of the food?

MS. CARLTON: Someone is -- someone..

MS. VELEZ: Great. And I know that if you look at that or see that..

MS. CARLTON: Perfect.

MS. LOVERA: The question is: Are consumers using those words? I'm not saying like the words aren't clear themselves if you sit down and look at a label. But when they go to the store and they purchase those foods, are they doing that, are they looking at that?

MS. CARLTON: I don't know if it's an answer, but somebody is raising their hand.

UNIDENTIFIED SPEAKER: Okay. This is a comment as a consumer. If I take my husband to the grocery store, he will kill me if we do not buy things based on the product identity. He has no time, no interest to look at an ingredient statement, to read a label claim, much less



look at the nutrition facts on the label. If we don't get in that grocery store get what we've got to get and get out, it will not be good for my health.

And this is the case for most consumers. I don't care how much information you put on that label; they don't have time to read it. They're going by the product identity and most product identities are tied to standard of identity. You can't change it without letting them know that.

MS. CARLTON: Okay. Great. And could you please say your affiliation as well? I think I missed -- please.

UNIDENTIFIED SPEAKER: Consumer.

MS. VELEZ: Consumer.

UNIDENTIFIED SPEAKER: Because I work for (inaudible response).

MS. CARLTON: I wanted everybody to hear.

MR. BAUER: Bob Bauer, Association of Food Industries. I don't think it's a big issue in terms of letting the consumer know. If I have a product with a standard of identity and there's been a change, it's a pretty darn good chance it's something for the better. And we want to get that word out there.

So, FDA has to tell people. And the industry and the players within the industry, you know, the associations and the companies within the associations, are going to be pushing out information out there because it's good news about their product. It's a reason to reach out to consumer. So, I don't think this will be a big issue.

MS. CARLTON: Wonderful. And I said in the end I just wanted to ask like an open-ended question and hear if anyone here has any other comment, any other experience that you would like to share related to all the different questions that we've been posing here. And if there's anything else you would like us to know, I would encourage you to speak.

If there is nothing, then we're just going to quickly go and summarize our session today and kind of emphasize the main points that we have learned. And this could also be opportunity to add something if you think it wasn't captured. So, I will ask Steve here to help me out. And I would like to ask also everyone to participate

in this, in summarizing our comments here. So...

MR. BRADBARD: Okay. The first question had to do with consumer awareness that some foods are standardized. We heard a number of people say: "Consumers probably aren't that aware of standards of identity. They don't necessarily understand them. And if you explain, they may not even feel they were appropriate that" -- in fact, one of the things that has a counter-effect is, if the product doesn't have an FDA standard, they can actually be some backlash, where it affects consumers when they hear it doesn't have an FDA standard. And it affects industry's ability to police itself.

But there does seem to be little awareness about the standards and significant gaps in consumers about what a traditional product is considered to be, especially with the plethora of new food products that are out.

Someone remarked "Consumers often don't even know what the product is, for example, the ingredients in mayonnaise or the different types of tea. So, if they don't know that, how can we really expect them to know much about standards of identity?"

"The plant-based foods," someone remarked, "have been captured in the media quite a bit, but not in -- or not including the majority of standards of identity."

Let's -- any clarifications or additional comments on Q (1)? Yes.

MR. GREEN: Randy Green with Watson Green. You may have captured it somewhere else on the flip charts because I can't see them from here, but I heard several people make comments variously saying that consumers probably are relatively ignorant of the specifics of standards of identity but yet have an expectation that when they go in to buy a product that, you know, they're going to be able to buy a consistent product in terms of quality, attributes and so on. So...

MR. BRADBARD: But I think towards the latter part of the session there was a lot more discussion about expectation.

MR. GREEN: Yeah.

MR. BRADBARD: And the fact that whatever is

done should be consistent with the customer expectations, so.

MR. GREEN: Yeah. I just want to make sure that was captured, because I think the initial responses to the question perhaps make standards of identity sound a little bit less important than I heard a lot of people saying they were.

MR. BRADBARD: Thank you. That's a very, very good point. So, the second question was how flexibility in the standards of identity can better help consumers meet their nutrition or their dietary goals. We did get here from IFIC that they have a number of different surveys they've done, and they have found in the most recent food and health survey that consumers want less sugar. They're real concerns of weight loss and management, cardiovascular health, cancer prevention. That some changes -- for example, if you're going to reduce the amount of sugar needed to be able to allow for a product name to take place, that would be of course consistent with what the consumers want.

As to claims work -- yeah, there was this whole thing about when you're saying something positive, it does influence consumers. And also missing ingredients: consumers will note if certain ingredients have been taken out and that affects their perceptions as well. Nutrient content claims are a form of horizontal change. That was mentioned. What else was there?

Next option, Q (3) I guess -- Q (4), Q (5), Q (6). Okay, what -- all right. Let's go on to the food -- okay, food attributes that are important. Because two, three and four kind of relate to each other and, you know, I think we had a lot of overlapping conversation.

Food attributes are important to consumers when looking at changes. The gentleman in the back mentioned ice cream and the milk fat issue in ice cream and that consumers have certain expectations about ice cream. This is where we began to hear much more about expectations.

Consumers are smart we heard from others. Not that all of you don't believe that. But consumers are smart. And they are able to respond to innovation. They have demands. And consumers want healthy. They tend to choose their foods often times based on the use and the

role that they fill maybe more in the case of some people than they do for nutrients or other types of considerations.

Standards of identity that create a fair playing field. And it's important that standards of identity keep a fair playing field and that it maintains a level of consumer expectation, that you're meeting consumer expectations.

Can standards of identity -- I like this -- work as a (ph) backstop or a short ingredient list for consumers? And that's why that's kind of important to have standards of identity.

FDA needs to assess the baseline knowledge of consumers. We need to let our partners and stakeholders (sic) what we want to know about consumers before we -- as we continue to deliberate.

Let's see what else we got there. One product, seven drivers -- yeah, the complicated nature of consumers, product attributes and consumer liking. One product can have seven different drivers for liking, tea can.

Low sodium. How do you compensate for iodine was brought up and also the remark about some people certainly wanting as a food attribute a plant-based diet? All right. I'll stop for a second.

Anyone have any other -- anything they want to bring up in terms of what we've just gone over? No. Okay. let's continue. Changes that would lead to consumers no longer seeing these products as being acceptable. The ice cream issue came around.

Then there was the whole notion of the rational consumer. He or she can turn around the package. You can put qualifiers on what it is, how to use it. It was mentioned "Are we paying too much emphasis on the usefulness of the words for communicating information to consumers?" Other factors, product placement, plant-based products being placed next to beef.

Absence claims such as gluten-free salt probably are problematic in the marketplace and that again they have halos that lead consumers to believe the product is different and better than regular salt.

Standards of identity ensure good quality

products in the marketplace; they will contain quality ingredients and meet consumers' expectations. I heard that.

Q (5), what data do we need? IFIC mentioned some of their work here in terms of the food and health survey, which they have done for 14 years, data on plant-based versus animal milk and sustainability environmental impact as it relates to nutrition and health goals. And the Consumer Food Safety Education Group also spoke up.

Q (6), information about horizontal changes that should be communicated to the consumers. This was a statement -- you know, kind of knowing things is to the side. We need to just guarantee product integrity and that the consumer is getting what he or she expects. In a lot of cases, these changes tend to be better. It improves the nutrition profile. That's good news and people will hear about it.

There should be, though, effort that in fact people, because there is so much competition in the marketplace, need to be educated about changes in the marketplace, "because they are creatures of habit," someone mentioned, and you want them to have new information to put in their decision matrix.

Let see. Most product identities are tied to standards of identity. That was mentioned. And in terms of doing education, we should be looking at other successful efforts, other strategies used to educate and inform people about something with which they're not very familiar like standards of identity. They have been other efforts made in the past to get people to learn more about things that either they have strong prior beliefs about or not much information at all, and we should do that.

So that's kind of the summary. And this was a very, very productive group. I mean, it was hard to keep up with you. Yes?

UNIDENTIFIED SPEAKER: Sorry. I wanted (off mic)

MS. VELEZ: Okay. One second.

UNIDENTIFIED SPEAKER: (off mic) So we talked about consumer expectations in terms of ingredients, in terms of a nutrient expectation, but something that I don't think got brought up is -- and maybe it's an

oversimplification -- is: What is the intended use of that standardized product?

So, when we're thinking about horizontal approaches that allow for flexibility, how can we define those expectations in terms of what is the end use? You know, if you're getting almond milk versus cow's milk, what are you using it for and what is expected from that product, the viscosity, the thickness and what not?

So when we're thinking through, again, those horizontal changes, how can we look to those definitions of what consumers expect in the end use and allow for ingredients that might -- that can be -- that can produce those products with that -- what's expected it to be used for?

MS. CARLTON: Yes. Thank you. Thank you. We're going to add this to the list of our notes. And I wanted to thank you very much for this very productive session and for your input and your time. And thank you so much. And I believe that you have a break now.

MS. VELEZ: A very short break. So I think the open public comment period begins at 2:35. Just to note, if you are providing public comment and you have not checked in, Juanita Yates is in a lovely blue jacket in the black of the main hall, if you could just let her know you are here. Thank you.