

**Oral comments of Consumers Union to the
Food and Drug Administration at the
Public Meeting on the Nutrition Innovation Strategy
July 26, 2018**

Consumers Union, the advocacy division of the independent, nonprofit member organization Consumer Reports, welcomes the opportunity to provide input on the FDA's Nutrition Innovation Strategy. Since 1936, Consumer Reports has worked side by side with consumers for truth, transparency, and fairness in the marketplace. Providing consumers with clearer, more accurate, and more useful information about their food has been a core part of this mission since our founding.

Just within the past year, CR helped consumers decipher the real meaning of various food labels, identify healthier foods in the supermarket, learn about ways to cut back on added sugars and sodium, and understand the latest scientific research on a variety of nutrients. We've advocated for mandatory menu labeling by chain food outlets—which we are very glad the FDA is now implementing. We've also sought revisions to the Nutrition Facts panel and other health-related labeling, as well as new policies to reduce sodium in food.

The Nutrition Innovation Strategy is an opportunity to make meaningful, lasting change in the lives of consumers. It can help ensure that Americans have plenty of affordable and healthy food options, including fruits and vegetables, whole grains, and dairy products that are low in saturated fat. It also can help consumers better understand, through simple and straightforward information, the nutritional value of different foods. If food companies compete on the basis of nutrition, then marketing and the other information companies present to consumers can help drive a virtuous cycle that both improves consumers' health and the corporate bottom line. But this is only possible if reasonable, responsible guardrails are in place, in the form of strong standards and diligent enforcement.

Today, however, consumers who want to make healthy choices must often grapple with confusing, deceptive, and meaningless nutrition claims. Foods that are falsely or misleadingly presented as nutritious—or those whose poor nutritional value isn't disclosed—can lead to preventable weight-related and diet-related diseases. If standards and enforcement are weak, and food companies are permitted to betray consumers' trust, companies may profit—but consumers and our country end up paying the price, both in terms of health outcomes and medical costs.

As the Nutrition Innovation Strategy moves forward, the FDA, industry, and other stakeholders will have numerous important decisions to make. We urge the agency and everyone in the room to be guided in their decisions by the promise of a food marketplace in which Americans can far more easily make healthy choices for themselves and their families. At Consumer Reports, we look forward to working with you to advance this goal. Thank you.