Our Brands ... just a flavor of what we have
OVERVIEW

• LANDSCAPE: Convey industry experience with food labeling policy.

• DIVERGENCE IN LABELING REQUIREMENTS: Provide brief overview of types of food labeling, the scope of regulatory activity, and challenges facing the industry.

• INDUSTRY COMMITMENTS AND ROLE: Review major trends in the industry response to labeling requirements
LANDSCAPE

• Food Labels Serve Multiple Functions
  – Consumer Information/Choice; Branding (protects against counterfeiting); Marketing Statements; Compliance with Multiple Regulations

• Requirements for Food Labels Vary Widely

• There Are Multiple Factors to Consider When Complying with Labeling Requirements
  – Allergens; Food Additives/Ingredients; Nutritional Content; Product Claims

• Labeling Initiatives are Proliferating with Decreasing Coherence
  – Mandatory, Voluntary
  – Fact-Based, Interpretative (Total Diet, Nutrient-Specific)
DIVERGENCE IN LABELING REQUIREMENTS

• Multiple Levels of Government and Organizations are Involved in Setting Standards
  — International; Regional; Bilateral; National

• Regulatory Coherence and Science-Based Labeling Regulations are Key to Ensuring Divergences Do Not Lead to Unnecessary and Costly Barriers that Negatively Impact Consumers

• Complying with Multiple, Complex, Divergent Requirements Imposes Significant Costs

• Industry has Unique Scientific Expertise And Operational Experience – e.g., Regarding Product Development Capacity and Timelines
INDUSTRY COMMITMENTS AND ROLE

• Industry Has Undertaken Multiple Voluntary Initiatives to Contribute to Improving Labeling and Meeting Consumers’ Needs
  – Facts Up Front, SmartLabel, EU Initiatives
  – Supported by Evidence of Consumer Understanding
  – Consistent with Relevant Codex Guidelines and U.S. Regulatory Framework

• New Technologies Allow for Additional Information

• Robust Consultation Leads to Better Outcomes
  – Transparency, Due Process, and Public Comment are Key Principles of Good Regulatory Practice
  – Science-based International Standards Help Support More Harmonized Outcomes and Facilitate Trade