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Submitted via email.

Introduction

UnidosUS (formerly the National Council of La Raza) respectfully submits these comments ahead of the Reagan-Udall Foundation for the Food and Drug Administration's Front-of-Package Nutritional Labeling Virtual Public Meeting.

UnidosUS is a nonprofit, nonpartisan organization that serves as the nation's largest Hispanic* civil rights and advocacy organization. Since 1968, we have challenged the social, economic, and political barriers that affect Latinos through our unique combination of expert research, advocacy, programs, and an Affiliate Network of nearly 300 community-based organizations across the United States and Puerto Rico. We believe in an America where economic, political, and social progress is a reality for all Latinos, and we collaborate across communities to achieve it.

Latinos are one of the fastest growing populations in the United States, with over 62 million Latinos accounting for nearly one-fifth of the total population.¹ Latino children represent more than one-quarter of all children in America.² However, Latinos face disproportionately high rates of diet-related diseases, including obesity and diabetes, that require culturally relevant solutions to address longstanding health inequities. As one of the fastest growing racial/ethnic groups, improving health outcomes for Latino adults and children is critical for the country's future. As such, we welcome the opportunity to provide comments on front-of-package nutrition labeling (FOPL) and its potential to empower the Latino community to make more informed, healthy food choices.

For over 50 years, UnidosUS has conducted research, advocacy, and community programs to advance Latino health equity and address diet-related health disparities. Our extensive work includes advocacy to advance improvements in federal food assistance programs like SNAP and WIC, implementing culturally tailored nutrition education interventions, and publishing data-driven reports on Latino health inequities. Through programs like *Comprando Rico y Sano*

* The terms "Hispanic" and "Latino" are used interchangeably by the U.S. Census Bureau and throughout this document to refer to persons of Mexican, Puerto Rican, Cuban, Central and South American, Dominican, Spanish, and other Hispanic descent; they may be of any race. Our materials may also refer to this population as "Latinx" to represent the diversity of gender identities and expressions that are present in the community.

(Buying Healthy and Flavorful Foods), UnidosUS has directly empowered Latinos to make nutritious and culturally-relevant food choices. Led by *promotoras*, or community health workers, *Comprando Rico y Sano* combines nutrition education and enrollment assistance for federal nutrition programs. From 2020-2022, the program provided nutrition education to over 95,000 Latinos, enrolled over 26,000 in SNAP, distributed 3.9 million pounds of food, and increased fruit intake by 41% and vegetable intake by 39% among participants.³ Our deep experience engaging diverse Latino populations on nutrition issues exemplifies our expertise in implementing effective, culturally tailored interventions to advance Latino health and nutrition equity.

Front-of-package nutrition labeling is a key tool in reducing health disparities impacting Latino communities.

Obesity and diabetes are some of the most serious and preventable health conditions afflicting the Latino community. Compared to non-Hispanic whites, Latinos are nearly twice as likely to suffer from type 2 diabetes. The disease afflicts 16.9% of Hispanic/Latino adults versus 10.2% of non-Hispanic whites.⁴ Moreover, 2013-2016 data show that Hispanic children were 1.8 times more likely to be obese compared to non-Hispanic white children.⁵ These disparities highlight the urgent need for culturally relevant solutions to improve Latino health outcomes.

A contributing factor to these high rates of diet-related diseases is nutrition knowledge and health literacy. Data from the Agency for Healthcare Research and Quality (AHRQ) indicates that 65% of Hispanic adults have basic or below basic health literacy, compared to 28% of white adults.⁶ Low health literacy is defined as difficulty accessing, comprehending, evaluating, and applying health information and services to make decisions.⁷ This can create significant barriers to navigating detailed nutrition information on food packages and labels for Latinos and lead to poor health outcomes.⁸ Integrating simplified front-of-package nutrition labeling could provide a tool to help address obstacles Latinos face when trying to use label information to identify healthier food options.

Widespread implementation of FOPL intersects meaningfully with federal food and nutrition assistance programs that serve a disproportionate number of Latino families.

Federal nutrition programs provide critical support for Latinos experiencing food insecurity. Latinos represent 42% of participants in the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and 16% of Supplemental Nutrition Assistance Program (SNAP) participants.⁹ However, participants often face challenges navigating the detailed nutrition labels on the back of products to identify healthier options for their families, especially when operating on an extremely limited food budget.

Implementing standardized, easy-to-understand front-of-package labeling (FOPL) could provide a valuable mechanism to help federal nutrition program participants more quickly recognize

nutritious choices that fit their budget. FOPL offers a simple tool for comparing products at a glance, without needing extensive nutritional knowledge or time to study labels. Integrating FOPL education into SNAP-Ed classes, nutrition counseling at WIC clinics, and food banks has the potential to empower families to leverage FOPL when shopping for groceries. Making FOPL available nationwide in stores would further aid program participants in making fast, informed, healthy choices for themselves and their children. This simple support can promote significant diet-related health improvements among Latino families and others relying on food assistance programs.

Leveraging lessons learned from Latin America’s impactful front-of-package labeling models can optimize implementation for U.S. Latinos.

As FOPL is developed by the FDA, Latin American countries provide insightful models of how impactful, culturally relevant front-of-package labeling can optimize influence on consumers’ food choices and improve health outcomes:

- Chile implemented a pioneering stop-light style warning label system in 2016. Prominent stop-sign warnings appear on the front of products high in calories, saturated fat, sodium, or sugar. One study found this approach reduced sugary drink purchases by 24% over the 18 months following implementation.¹⁰
- In Mexico, compulsory FOPL regulations took effect in 2020, requiring either Guideline Daily Amount labels or warning labels on foods and beverages high in calories, saturated fat, trans fat, sodium, and sugar. An analysis of the potential impact estimated Mexico’s FOPL could lead to significant reductions in obesity and diet-related diseases.¹¹
- Peru rolled out mandatory front of pack warning labels in 2019 for high levels of sugar, sodium, saturated fat, and trans fat on packaged foods. Studies show that nutrient warnings on products with excessive levels of unhealthy nutrients help consumers make healthier choices.¹²

These and other Latin American FOPL approaches provide excellent case studies for crafting labels optimized for Spanish-speaking populations and immigrants accustomed to relying on front-of-package cues in their home countries. Applying lessons learned from their successes to FOPL in the United States could aid navigation of American grocery stores and food environments.

While initiatives in countries like Chile, Mexico, Brazil, and Peru provide helpful context, it is important to recognize their limitations in application to U.S. Latinos. Chile, Mexico, and Peru are important cultural touchpoints; however, Chileans and Peruvians are small segments of the U.S. Latino population. To be effective, FOPL efforts must be tailored through extensive consumer research specifically with diverse Latino subgroups in the U.S., particularly low-income non-English speaking communities. While international examples are useful, improving

nutrition literacy and health equity through FOPL will require dedicated testing and implementation of FOPL customized to resonate with and empower the Latino populations in the United States. We emphasize the need for substantial research on how to optimize FOPL for U.S. Latinos and other communities of color.

Front-of-package labeling incentivizes industry to improve the nutritional quality of foods and beverages, improving the food environment for low-income communities of color.

In addition to empowering consumers, research shows front-of-package labeling incentivizes manufacturers to reformulate products to achieve healthier ratings. A growing body of research demonstrates that front-of-package labeling not only influences consumer choices, but also effectively motivates industry to reformulate products and improve the overall nutritional quality of the food supply. For example, one study found that following the implementation of Chile's mandatory "high in" warning labels, the percentage of products qualifying for high-in-sugar labels dropped from 80% to 60%.¹³ Voluntary systems like Australia's Health Star Rating have also prompted reformulation, though effects appear more limited.¹⁴

Research indicates FOPL can drive industry to reformulate foods, including Latino cultural staples, to reduce calories, sodium, added sugars, and unhealthy fats in order to score better on front-of-package systems. This effect would improve the nutritional profile of many Latino favorite foods like tortillas, beans, salsas, and rice that are core parts of a traditional diet. Enhancing the healthfulness of ethnic products regularly purchased by underserved populations can promote equity by expanding access to better nutrition options in Latino neighborhoods and communities.

Extensive research demonstrates Latinos actively use and value FOPL to make healthy choices.

A large body of evidence consistently demonstrates that Latinos actively use and value front-of-package labeling (FOPL) as an effective tool for overcoming language and literacy obstacles and enabling healthier food selections. In a study of over 1,100 adults in low-income, minority New York communities, 27.5% reported that the presence of calorie labeling influenced their food and beverage choices.¹⁵ Additional studies in Latino populations show use of interpretive, graphic-based FOPL systems outperform numeric, nutrient-specific labels in improving ability to identify healthier foods.¹⁶

Notably, research studies demonstrate that front-of-package labeling is particularly impactful in aiding healthy food choices among low-income consumers with lower literacy or education levels. In a 2022 study on the effects of digital FOPL during online grocery shopping, individuals, particularly those with low health literacy, chose products with a higher nutrition quality when exposed to FOPL.¹⁷ As Latino adults have lower average educational attainment and health

literacy compared to white adults, these findings indicate that an optimized FOPL could provide a valuable tool to facilitate healthier choices.

To maximize FOPL's benefits for the diverse Latino community, labeling should be:

- Supported by research showing their effectiveness in communicating key concepts to a range of consumers, including those from the Latino community;
- Optimized for comprehension and use across Latino subpopulations through rigorous consumer testing with Spanish-speaking, lower-literacy, and immigrant shoppers;
- Offered with Spanish language versions and culturally relevant imagery;
- Placed prominently on the front of food packages, including ethnic products popular with Latinos; and
- Supported by strategic and culturally competent efforts to promote adoption, build awareness, and educate Latinos and other communities of color about how to use FOPL when shopping.

UnidosUS applauds the FDA's efforts to strengthen nutrition labeling on food packaging to promote public health. As the data and research demonstrates, implementing thoughtful, equity focused FOPL nationwide has immense potential to enhance nutrition literacy and empower informed, healthier food choices among the Latino community. Given the disproportionate diet-related diseases impacting Latino children and adults, culturally-optimized FOP labeling can be one effective tool to help address long-standing health inequities. By empowering nutrition literacy and informed choice, effective FOPL implementation can significantly improve diets and health outcomes, advancing health equity for the Latino community. Should you have any questions or need further information, please contact Umailla Fatima, Health Policy Analyst, at ufatima@unidosus.org.

Notes

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- ⁹ USDA-FNS. (2021). WIC participant and program characteristics 2020. <https://www.fns.usda.gov/wic/participant-and-program-characteristics-2020>. And USDA-FNS. (2022). SNAP Community Characteristics 2019. <https://www.fns.usda.gov/resource/snap-community-characteristics-2019>.
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