



August 6, 2024

Commissioner Robert Califf
U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Commissioner Califf:

We write to urge you to prioritize the development of a mandatory front-of-package nutrition labeling (FOPL) system that meets the needs of Latinos and other historically disadvantaged communities. We are concerned about repeated delays to a proposed rule and ask that you move quickly in the best interest of working-class communities.

As organizations dedicated to promoting the health and well-being of Latinos across the country, we believe this action is critical to address the disproportionate burden of diet-related disease in our communities. The health inequities facing Latinos are stark and demand immediate action. Latinos are nearly [70%](#) more likely to suffer from diabetes and [30%](#) more likely to die from it, compared to non-Hispanic whites. Latino adults are [1.2 times](#) more likely to be obese, and obesity is [50%](#) more common among Latino children and youth (26% vs. 16% for non-Hispanic white youngsters). These problems reflect a broad range of social and economic risk-factors that disproportionately harm Latino families.

Unfortunately, to protect themselves from these dangers, many Latino families cannot effectively use an essential tool for guiding healthy food choices—the back-of-package Nutrition Facts Panel. [31%](#) of Latinos have low literacy levels, compared to 12% of non-Hispanic whites; and [45%](#) of Latinos have low levels of numeracy (understanding numbers and their manipulation), compared to 20% of non-Hispanic whites. Nearly [a third](#) of Latino families (31.5%) include children under age 6, making it challenging for parents to study detailed nutrition labels while shopping with their children. By contrast, just 18.2% of non-Hispanic white families include children under age 6. Put simply, many Latino families cannot effectively receive the information they need to make healthy choices for their families; and food companies have little incentive to develop and market healthy foods to Hispanic communities.

A well-designed FOPL system can directly address these barriers. This system uses clear and straightforward graphics to effectively communicate key information to consumers who may

struggle to understand a nutrition fact label — including those with limited English literacy and numeracy as well as people shopping with young children in tow — helping them in making better informed purchasing decisions. Such FOPL approaches also incentivize food manufacturers to develop new products and create healthier options for historically disadvantaged communities, including healthier versions of Latino cultural staples.

We are concerned at the repeated delays in the FDA’s release of FOPL draft regulations, and we urge you to move forward as quickly as possible. The Latino families on whose behalf we advocate cannot wait; the need for improved nutrition is urgent.

Moreover, to ensure that diverse Hispanic communities gain full and equitable access to FOPL's benefits, we recommend that the labeling system be research-backed and consumer-tested with Spanish-speaking, lower-literacy and immigrant shoppers. Examples of very simple, graphically powerful systems that could prove effective with such consumers include stop-sign-shaped warnings for products that are high in sodium, added sugar or saturated fat; and color-coded indicators that use red, yellow= and green to flag products that have high, medium or low levels of those high-risk nutritional elements.

Such FOPL approaches, [used in many Latin American countries](#), have increased consumer choice by incentivizing the development and marketing of healthier products. Some argue that FOPL requirements represent government overreach. But rather than limit consumer choice, effective FOPL increases choice for members of historically disadvantaged communities by giving them additional, healthy options. It also empowers them by conveying key information in an accessible way that they can use to make informed decisions for their families.

Well-designed FOPL requirements promise to significantly improve health for millions of Americans of all races and ethnicities, with particularly large gains for Latinos. By acting as quickly as possible to require clear, accessible nutritional information on the front of each food package, the FDA can help consumers make healthier choices and ultimately reduce the burden of diet-related disease.

Thank you for your consideration. We look forward to your response and action on this vital issue.

Sincerely,

Alianza Americas
ASPIRA
LatinoJustice PRLDEF
National Hispanic Council on Aging
National Hispanic Medical Association
SER National
UnidosUS