

# IOM Issues Phase II Report Recommending Energy Star- Type Ratings for a Food Front- of-Package Nutrition Rating System

October 25, 2011

On October 20, 2011, the Institutes of Medicine (“IOM”) issued [Phase II](#) of a two-part report regarding front-of-package nutrition labeling systems and symbols. The report, created by an IOM Committee convened in response to a 2009 Congressional request, provides recommendations regarding implementation of a front-of-package nutrition rating system designed to “encourage healthier choices and purchase behaviors.” Key recommendations include the following:

- Federal agencies should use the IOM Committee’s recommendations to develop a single, simple front-of-package nutrition rating system with symbols that graphically convey calorie information and a “point” value showing whether nutrients of concern (i.e., saturated and trans fat, sodium, and added sugars) are below threshold levels (as established by the Food and Drug Administration (“FDA”) and other federal agencies); and
- The front-of-package system developed by federal agencies should apply to all food and beverage products and replace any other symbol currently being used on the front of packaging.

According to the Committee, a front-of-package system should be modeled off of current government front-of-package ratings programs, like the Environmental Protection Agency’s Energy Star program, which has been “highly successful in changing consumer purchase patterns for household appliance and electronics.” The Committee’s recommendations are intended to serve as the starting point for federal agencies to “develop, test, and implement a single, standard front-of-package system to appear on all products.” As federal agencies review the IOM Committee’s report and determine how a front-of-packaging system should be implemented, food and beverage manufacturers, food retailers, and other entities in the food industry should monitor the agencies’ progress and be prepared to provide comments and other information as necessary.

More information regarding the IOM Committee’s report can be found in Kelley Drye and Warren’s October 24, 2011 [Client Advisory](#).