
A Partnership for Public Health: *Branded Food Products Database*



Notes from Listening Sessions Convened October 10 and November 14, 2013 Executive Summary

On May 22, 2013, the inaugural meeting of the Criteria Group of the “Branded Food Products Database for Public Health” Public-Private Partnership was convened. The Group developed a set of preliminary criteria for augmenting the USDA National Nutrient Database with producer-provided data on nutrient composition of branded food products.

The Steering Committee then requested that the Partnership convene a series of listening sessions to engage a broader group of stakeholders. The purpose of the listening sessions was to communicate about the Partnership, gather input regarding current and potential usage, and opinions on proposed criteria to the USDA National Nutrient Database, specifically from existing user groups and food manufacturers.

Two listening sessions were convened in Cleveland, OH (October 10) and Washington, D.C. (November 14), the latter was co-sponsored and hosted by the National Academies’ Government-Industry-University Research Roundtable (GUIRR). Ms. Robbie Melton, of ATIP Foundation member TEDCO (Maryland Technology Development Corporation), moderated both sessions. Each listening session offered in-person or webinar participation. The October 10 session totaled 13 in-person, and 25 via webinar, and November 14 participation included 45 in-person, and 22 via webinar. Due to the government shutdown, there were no federal participants on October 10.

The entire list of comments was provided to the Criteria Group and subsequently to the Steering Committee at December 11 and 12, in-person meetings, respectively. Preliminary discussion ensued as to which of these might be possible in the short term, long term, or not consistent with the stated goal and statement of work of the Public-Private Partnership. For example, suggestions to include allergen data were tabled for further discussion or possible future listening sessions. The Steering Committee agreed that it is critical to set achievable goals in the short term to get the project off the ground before the Partnerships tackles all the suggestions from the listening session participants. Therefore, allergens were placed in category of TBD Proposed Future Attributes.

Eighteen questions were posed to listening session participants, and a total of 171 comments were received. Some highlights of these are provided in this summary.

A number of comments identified the various current uses for the USDA National Nutrient Database, the value of and the expected increased utility of the proposed enhanced database. Responses included; use for early stages of product development, to educate consumers, for developing enhanced 3rd party proprietary nutrition guidance software, evaluating competition, calculating nutrition values for recipes, and for clinician use to counsel patients.

Several food manufacturers in attendance commented on the frequency of receiving requests for nutritional composition of their products; some reported 20-50 per day, including 15-20 from analysts that use such information for label development; some reported 100-500 redundant requests per year. Several participants strongly encouraged the development of a single-source, comprehensive, reliable, current USDA National Nutrient Database where they could refer all such inquiries. This would allow a refocusing of some of their human resources. Twenty-five responses were received to the question “What kinds of information would you like to add to the proposed enhanced USDA National Nutrient Database; what is important and what is missing?” Key responses included: a one-source database with a robust search engine and downloadable data; data that reflects what people are truly eating (updated at least annually, reflects variability and includes products from retail stores, restaurants, food service); more current oils, trans fatty acid information; phytonutrients; date stamp to facilitate changes in products and diet over time; nutrients of public health concern; and descriptive information of ingredients declared on the label (Nutrient Facts Panel, Ingredient list and when provided Expanded Facts Panel Data). Again, the appeal for a single-source for comprehensive, high quality, current database was expressed.

A related question was “what additional features would you like to see in the database?” Perhaps the most dominant issue was a request for including declarations on content of the major food allergens, and gluten. Additionally, clinicians made an appeal for addition of data on food additives and food preservatives in the short term and will be possible with the inclusion of the ingredient list of a food product.

A series of questions honed in on the perceived or expected value for food suppliers to participate in this Public-Private Partnership by providing data on their products. Responses included: that this would be a publicly accessible database to promote nutrition information on their products; a frequently updated and reliable single source for high quality data; and THE definitive data source for nutrition that could be used by policy officials. On the ancillary question of “...what would be important for your company to participate...,” there was the repeated comment that the process cannot be burdensome to industry, that a single “push” to one place in a standard format would be needed (e.g., GS1’s Global Data Synchronization Network).

There were strong and repeated suggestions to broaden partnership with other agencies with related goals in human nutrition (such as CDC, FDA, NIH), to engage universities that have complementary programs (e.g., University of Minnesota, University of North Carolina), and private sector corporations involved in providing nutrient and marketing information to their

clients (e.g., Mintel, GS1, Nutritionix). Representatives from the three Partners have already made these contacts and are engaged in information exchange to determine value to the Partnership (ongoing).

Responses were quite varied – and comprehensive – to the question, “what would you like the Criteria Group to know?” Responses from food producers included: that GS1 is already capturing much of the information proposed; it will be difficult to update data and information immediately (perhaps annually is a reasonable target); future listening sessions are important to convene for the purpose of gauging whether the project is on track with stated goals; that proprietary database managers draw from the USDA National Nutrient Database and would benefit from the enhancements; data to include will be very complex, and both quality assurance of submitted data is necessary, and that a pilot study should be undertaken to verify data are added correctly and that the new data improves the performance of current reports. The Partnership is currently pursuing the opportunity to convene an annual listening session at the National Nutrient Databank Conference. These listening sessions would not be limited to conference attendees and would rotate across the country. It was also noted that the search function and end user experience are important and need to be developed in a user-friendly and easily-accessible manner. Some comments focused on the need for incentives for industry to participate because there is a financial burden to provide such data, and it is imperative that the enhanced database be the single source for accurate information so that the number of requests to industry diminish (i.e., this needs to be THE place to submit data, not ANOTHER place).

Comments on the proposed short term criteria proposed by the Criteria Group focused on three areas. First, the appropriateness of using standard unique product identifiers such as the Global Trade Item Number (GTIN) was expressed. Second, that the Nutrition Facts Panel and Expanded Facts Panel data would be very beneficial but the enhanced database should also include phosphorus, flavonoids and other phytonutrients, and should be reviewed periodically for consistency as to what goes into the database. Third, there was concern expressed regarding food group classification based on the Dietary Guidelines for Americans in that it could reveal proprietary information that would discourage industry participation. The Steering Committee and the Criteria Group agreed that food group data is extremely important and should be a goal for the Public-Private Partnership to obtain for the database but it will take more time than the first phase of attributes.

Participants were uniformly grateful to be included in the listening sessions, supportive of the Public-Private Partnership effort, and related that success in this initiative would greatly benefit their specific needs and enhance their related programs / projects. All participants (in-person and via webinar) have received the entire list of comments obtained by the Partnership which are provided below. Outreach and additional comment- seeking activities will continue. The Steering Committee has begun the process of establishing priorities to the expansion of the USDA National Nutrient Database and identifying 3rd party IT capabilities and partners.

Listening Session Discussion Notes from 10 October and 14 November “Branded Food Products Database for Public Health” Public-Private Partnership

Discussion Notes Key:
Black: 10 October listening session notes
Red: 14 November listening session notes

- I. For what purpose do you currently use the USDA National Nutrient Database?**
- a. When a supplier doesn't have nutrition data.
 - b. For commodities to calculate nutritional content. 500-600 commodity ingredients are included in the database with complete nutrient composition.
 - c. In the clinical setting, dieticians and health care providers use it to analyze 24-hour recalls and food frequency questionnaire. The current database has limitations because it doesn't always match what people are eating. For example, in a 24-hour recall, an individual's response includes brand names for a Greek yogurt, orange juice, and granola. The database currently only includes a generic form of two of these examples.
 - i. Greek yogurt is not in the database. Therefore, even generic updates would be incredibly important.
 - d. To understand how USDA defines a generic item, such as an apple.
 - e. To support and fill in the lab testing of certain nutrients.
 - f. We use it for some nutrients, vitamins that we're not sure how often the data is updated to know if it's really reflected. Frequent updates would be beneficial because the ingredients can change frequently in a food product. For example, it is key to have accurate information on potassium.
 - g. For density factors.
 - h. For early stages of product development on a theoretical basis. When creating a product from the bottom up, one can look for ingredients that we might not already have data for. For switching out a formula with various ingredients to see what the differences might be in the finished products. Finally, you can then compare to similar products in the database.
 - i. To educate consumers that similar products have different levels of nutrient, i.e. a basic ham and cheese sandwich may have different levels of nutrients than a branded ham and cheese sandwich.
 - j. Consumers are using the database through MyPlate SuperTracker on their own to track their dietary intake.
 - k. Google now has in their search function “calories in yogurt” the nutrient information shows up and some of that information comes from the USDA database
 - l. A proprietary database provider uses the database as the foundational piece of their 50,000 food product database that is marketed to consumers. This company also researches and includes branded and restaurant data in their proprietary database.
 - m. For produce and products with a standard of identity, but not for branded products.
 - n. For nutrition education materials. With clients. For research.
 - o. Through its affiliation with NHANES, creating software that is used in research for dietary intakes and chronic diseases. For a variety of research projects ranging from food

microbiology to food chemistry, looking at food composition to support research projects.

- p. Investigate nutritional labeling declarations. Use the data to help with product labeling.
- q. R&D
- r. Checking out the competition and cross check labels.
- s. Generate label declaration values with help from the information.
- t. To look up nutrient values, to compare values to other databases, to find out if something has been updated, standard serving sizes, obtain bioflavonoid data for fruits and vegetables.
- u. The USDA National Nutrient Database for Standard Reference (SR) is the basis for calculating nutrition values for recipes.
- v. For reference. Use SR as a baseline to compare information from vendors.
- w. On a 4 year basis, build our database to build the food frequency questionnaire, build profiles based on market share information and on recipes.
- x. Clinicians use it to counsel patients.
- y. Students use the SR as a reference for research.
- z. It is the foundation for every clinical study that relates to human nutrition.

II. How many requests do you get for nutritional information?

- a. As a food company, we get redundant requests, approximately 100-500 per year. With GS1, we now have better ways of supplying the information.
- b. It is typical to receive multiple requests, which vary between different processors.
- c. Daily, weekly, monthly for people who need to use the tools that depend on the SR.
- d. Industry receives requests internally (sales and marketing) and externally on a daily basis, requesting information in multiple different formats.
- e. Unique requests, questions about labeling and nutrient content of foods, currently refer members to the SR.
- f. Examples of external requests: from retailers, non-government and government organizations, private app developers who are trying to measure progress against commitments and update internal databases.
- g. Numerous requests in different formats, 100 gram data or others, global nutrition, legal, and marketing internally, publish on the internal website on a daily basis and externally once a month, 20-50 requests a day.
- h. 15-20 requests from analysts that use this type of database for label development, answering questions, as the basis for nutrition calculations, requests received ongoing/hourly.

III. What kinds of information would you like to add to the proposed enhanced USDA National Nutrient Database? What would be important for you? What is currently missing from the database that you would like to see in the database?

- a. A quick, user-friendly, and comprehensive search engine. Search engines can be cumbersome.
- b. To see a variety of producers of different food items, a variety of types, the more options the better.
- c. Reflect what people are truly eating which varies geographically.

- d. Fast food restaurants and geographical differences at these restaurants would be excellent.
- e. Should include several line extensions of a particular product (different sizes, shapes, promotions of a particular product).
 - i. The granularity of what someone would pull off the shelf.
 - ii. Recommendation to still keep the regular “generic” version of the food.
- f. Would it be possible to identify if the variables are analyzed or derived from USDA ingredient data?
- g. Could we have more current oils in the database?
- h. *Trans* fatty acid information.
- i. A complete nutrient composition for a food is critical and difficult to obtain. Currently, nutrient data of many foods is incomplete.
 - i. What does complete mean?**
 - 1. More than what is on the Nutrition Facts Label, such as additives which are a huge piece and Dietary Reference Intake (DRI) more than Daily Value (DV).
 - 2. The information we can get from manufacturers and retailers on branded/private label products. We should focus first on information that is already available such as the NFP but is currently not in one user-friendly place and publically accessible.
 - a. What is considered user friendly?**
 - i. Unit and serving size. Giving options, not just in grams (use tbs, cups, etc.) but user friendly portion sizes to reflect what people are really eating.
 - ii. Translate serving size.
 - iii. Made with/made without: when people are preparing food at home, they don’t necessarily follow the exact instructions on the box so nutrition information will be different. Varieties of ways to make products.
 - 1. Same with restaurant/fast foods: what are the options people are asking for (adding/removing parts of the meal.)
- j. A list of the ingredients for the branded products in a downloadable, user-friendly database that will be tracked over time.
- k. Date stamps to track products over time, snap shot of the label- so in an update, the manufacturer can note if the product is still on the market or if the formulation has changed.
 - i. As a producer, there is a gray zone between when you are no longer creating a product but it could still be sitting on the shelves.
 - ii. The PPP has heard from federal agencies that it would be an enormous benefit to have a date stamp. The food consumption data is collected in a particular year and nutrition researchers would be able to match it to the date stamp.
- 1. Ingredients that manufacturers are actually using today.**

- m. Brand name product information would make creating tools easier, including the full range of nutrients available from the USDA National Nutrient Database for Standard Reference currently and the Food Patterns Equivalents Database (FPED) (formerly called the MyPyramid Equivalents Database (MPED)) values to look at food groups would be incredibly helpful.
- n. As much information as possible into one database, not replication of data in different places, one update at one time.
- o. Ingredients: descriptive information of ingredients declared on the label. Would not want to see percentages of ingredients or formula information because it is considered proprietary. Descriptive rather than quantitative.
- p. Nutrients of public health concern that may not be on the label, for example, phosphorus, fatty acids.
- q. Needs to be updated to include more foods that people are actually eating now. Public is wanting information on foods that are not in it.
- r. Invaluable to see more basic commodity foods and understand crop-year variation.
- s. For branded foods, having a unique identifier for the brand. Separating the brand name as a separate field.
- t. A date stamp for branded products to tell when the values have been updated.
- u. Raw milk vs. pasteurized milk.
- v. This would apply to any dairy products.
- w. Phytonutrients
- x. Would like to see established glycemic index/glycemic load values for available foods, bioflavonoid data for more foods, added vs. intrinsic sugar data, and nutrient profiles for ingredients frequently used but not currently available in the database, such as oils/shortenings/margarine (partially hydrogenated palm oil, partially hydrogenated palm kernel oil, partially hydrogenated coconut oil, partially hydrogenated lard, hydrogenated palm oil), beet juice, fig juice, raisin juice, cucumber juice, pear powder, pea fiber, montina flour, manioc flour, goji berry, aronia juice, and dragon fruit juice. Would also like to see more branded products such as snack bars and other snacks. Caffeine, both added and naturally occurring forms of it.
- y. Different sizes, list of UPCs that correspond to particular sizes/products.

IV. What additional features would you like to see in the database?

- a. Allergen changes that could change in reformulations.
 - i. For locations other than the primary package, things do come on and off the product constantly, don't want the consumer to make allergen choices based on the website- want to make the choice based on the food label.
- b. Economic piece- for the consumer to put together their meals. Familiar with another ILSI North America project that would be beneficial to this enhanced database.
 - i. The Food Value Decisions project examined data from a publically available database into one database to help understand the factors that influence consumers' food choices and selections (food cost, time of prep, nutrition, shelf life, cooking skills) along with the nutrition (home prepared vs. frozen/prepared foods). The web-based application is found at foodvalueanalysis.org.

- c. Format of the database- currently have to search or a specific key word. Is there a way to put this into a different format or a spreadsheet? Would be useful for consumers who are analyzing a full meal instead of just one food, a combination of foods and ingredients.
- d. Market share? Changes in this over time? Comparison of market share based on companies?
- e. Requests from dieticians for juicing ingredients. Push for raw foods to be put in the database.
- f. There are a variety of foods including raw ingredients. Cooking methods for such foods changes the nutrient composition of the food.
 - i. More regulations for the industry is always a concern. Limited space on labels and the incoming ingredients have such variability in terms of nutrients based on where it's sourced from and that can't always be accurately reflected on the label. The cost of food will increase with increased regulatory changes.
- g. A participant asked: Do we have a clear picture of how USDA sees the users of this database?
 - i. Manufacturers don't have a lot of this data being discussed today. Perhaps aligning with USDA Dietary Guidelines for Americans or medical reasons for the data would be helpful so manufacturers will collect this data.

V. Do you collect any nutrient information that is not required for the NFP?

- a. We try to find out more but the reality is that ingredient suppliers, particularly smaller suppliers, don't have that data and when it is not required on the NFP, we are not going to ask them to do that. Often the information is incomplete, such as phosphorus.
- b. A participant asked if ingredients could be shared in the future? It is important to track the ingredients and changes of the ingredients over time?

VI. What are the benefits to potential data suppliers? As a provider of information, what would be important for your company to participate? Why should the industry provide this information? From the producers of the food, what would you like to see? What would be an advantage to your company if it were disclosed?

- a. It will be a publically accessible database. Products are accessible to the public so the nutrition information is more readily available. Thus, the consumer might be more likely to buy the product.
- b. Competitive edge for Nutrition Facts. Instead of having to go to the store to compare the NFPs between products, the public can do it on their computer.
- c. The data is updated and correct. If there is a timely, accurate database people can go to, they will have better information on the reduced sodium in a product (people will not be looking at 20 year old data that do not reflect positive changes in product formulations.)
 - i. Critics of the industry love to go back to old data and this would allow them to have updated data.
- d. Important for manufacturers that accurate, up-to-date information is in the database for policy officials. Don't want outdated data to drive public policy.
- e. This is a voluntary submission of information so it has to benefit the data submitters.
- f. A participant asked: are we creating something that already exists?
 - i. While we do not get requests from consumers often, the greatest concern is the multiple requests from retailers. We are already invested in GS1 to address this

issue. We make thousands of label changes each year. The resources required to enter even twice will have push back by my company. We are currently working towards 100% compliance with the GS1 initiative.

- g. The end users that would envision using the enhanced database want to know what to expect for how this effort will be funded. Will we have initial funding and then it will decline?
- h. The data needs to be a single push or be accepted in the same format. If we're already doing a data dump to GS1 can it be accepted in the same format for this initiative?
- i. This can't be a burden to providers.
- j. Given the large number of products that move in and out of the food system, will there be some type of process to decide which products will be included and which ones will not? Or is the goal to capture everything? What is the span of time that a product needs to be on the market in order to be included in the database?
- k. Biggest requirement is to have one place to upload data.
- l. Need to consider the resources required to provide this information. Start small and scale fast. Provide the information that is already available to the consumer.
 - i. What resources need to be considered?
 - 1. How the information is gathered needs to be easy. Already getting requests daily for information in multiple formats so one format in one spot would be great. Could send everyone else to the database to get their information
 - a. USDA National Nutrient Database uses linear regression to generate missing values for nonproprietary and proprietary. Make algorithms available for only nonproprietary foods.
 - 2. Who will pay for the analysis of the nutrients?
 - a. Whatever is on the label will go in-analytical or calculated data. The idea is to enable the information to be captured. Need to be aware that there will be some error. There is a way to QC but it is expensive so it may not be possible on the outset but it could be done for the longer term.
- m. If percent (%) Daily Values (DVs) are provided on micronutrients, there needs to be a place to say when the DV is based off of a particular population group such as infants, young children, or pregnant women.
- n. Added sugars are not required for the NFP, and this information is proprietary in some cases.
- o. The end users of this data- we need to be assured that if people are downloading the data, there is a requirement that they use the most up to date information so that they reflect what's in the database. Need to create some rules or standards for use because right now anyone can access the database.
 - i. Time stamp will be crucial so the end user can see when it has been updated.
 - ii. Time stamp alone isn't enough because the consumer doesn't understand how quickly things change.
 - iii. Can display based on the date stamp; prioritize the most recently updated over others.

- p. Nutrient data maintained by brand owners are most likely to be the data used for nutrition label declaration. As USDA considers the data to be added to the augmented USDA National Nutrient Database for Standard Reference, some facts about nutrition label declaration data should be well understood:
- i. The granularity of data often included in the USDA database may not be present. For example, total fat, saturated fat, and *trans* fat are typically declared (although meat and poultry products regulated by FSIS are not required to declare *trans* fat content). Occasionally, under certain conditions, monounsaturated fat and polyunsaturated fat content are declared. Content of individual fatty acids is not declared.
 - ii. Amino acids content is not declared.
 - iii. All vitamins and minerals present in the food may not be declared, unless the food has added nutrients or expresses a claim about a nutrient. Only vitamins and minerals with Daily Values established by regulation may be declared on the NFP. As a rule, declaration of vitamins and minerals may include only the required vitamin A, vitamin C, calcium, and iron.
 - iv. Label values are rounded for declaration, following FDA and FSIS regulations. The label declaration for labile nutrients tends to reflect the amount of the nutrient at the lowest point in its shelf life (i.e., end of shelf life). In addition, declarations for nutrients to limit tend to be slightly over-stated from actual content, while label declarations for nutrients encouraged in the diet tend to be slightly under-declared. These adjustments align with regulatory compliance criteria.
 - v. For conventional foods (as opposed to dietary supplements), vitamins and most minerals are declared only by percentage Daily Value per serving.
 - vi. Nutrition label declarations do not differentiate between added and intrinsic nutrients.
 - vii. Reported label values in the database would mean that other types of display, such as information per 100 grams of food, typically would need to be extrapolated from the reported information and we need to be cautious of simply back-calculating from the percent DV because these values are rounded..
 - viii. Most values declared in nutrition labeling are for the food product as packaged; some foods requiring preparation also declare nutrient values per serving, as prepared.
 - ix. Nutrient data per serving for foods in single-serving containers, which are defined by regulation, would differ from the data declared per serving for the same food in larger containers.
- q. Rules for protecting trademark names need to be created and rules that users cannot make claims about branded food products that are not confirmed by the manufacturer.
- i. Trademark Law. Shouldn't be viewed as a concern because it allows for descriptive use of a trademark. Laws are very well established.
 - ii. If a name of a product exists in the SR, it should be referenced in the same way. Third party claims cannot be made if they are not claimed by the manufacturer as well.

- iii. USDA ARS noted that the agency doesn't have regulatory authority so USDA cannot make rules about how the database is used.
 - r. Would like to make sure that all producers are included in the database because it could disadvantage a company that includes their information when others do not.
 - s. Need to be careful that this is a comprehensive database and includes everyone.
- VII. Any concern about giving away trade secrets?**
 - a. This goes back to food groups. Cannot break down the subgroups of each food group in a food because it is proprietary. The description of an ingredient vs. the amount of an ingredient would be preferred.
 - b. Also need to be careful about branding. Have to make sure there are different levels of branding because large companies own smaller companies under different names.
 - c. Companies that do analysis on their products are not creating analytical values for the number of nutrients currently in the SR. SR currently imputes or calculates those missing values. Need to make sure the consumer knows the difference between what is analyzed and what is calculated. There is a degree of uncertainty in the calculated values.
- VIII. What are the most critical criteria that should be added in the short term?**
 - a. From a clinical dietician's perspective, food additives and food preservatives, although it was recognized that this might not be feasible in the short term. These additives are in foods that they were never present in before so it is difficult when giving instructions in terms of medications, etc.
 - b. New foods in the market.
- IX. What would you like to see the database look like in 10 years?**
 - a. Multiple requests for nutrition information will be eliminated because there will be a central location where all end users can draw down the data.
 - i. Not envisioned to compete with proprietary databases that have added value. We want to make it easier for these end users to have access to accurate data they can use in their proprietary databases.
 - b. Many of the people present are global manufacturers; dieticians in different countries are asking if this will help them as people are increasingly eating foods from different countries.
- X. How much do the actual analytics prohibit you? What are the resources in terms of getting that information? What are some of the things that prohibit you? In terms of technology or suppliers?**
 - a. It costs USDA approximately \$50,000 for the analytical analysis of one food for the National Nutrient Database.
 - b. Unless we're making a nutrient content claim, most of it is derived from other databases.
 - c. If a product's nutrient composition doesn't change during processing then you have more confidence in calculated nutrient values. But, for example, in meat there are so many process variables, analytical data is done.
 - d. Analyzing commodity ingredients is easier because their numbers are limited. Combinations of ingredients in food products are more complicated.
- XI. What would you like the Criteria Group to know?**
 - a. Most of the information that is being requested is being captured by GS1.

- b. It will be difficult to update data information immediately. Perhaps an update once a year, etc.
- c. You have to look at the cost effectiveness. For smaller companies, some of the regulatory implications could put them out of business (*note: this is a voluntary program.*)
- d. Maybe in a year or two we could come back and do more listening sessions to see if the project is on the right track. There needs to be a continuing dialogue.
- e. The PPP should investigate and review the product databases that are currently on the market. Other databases are being built or already exist so important to speak with them and gain understanding of what is already out there so we don't have to reinvent the wheel. Many are proprietary databases that draw from the USDA National Nutrient Database. What would help them and what would they like to see that they're not getting now?
- f. While from both public health and clinical perspectives, it is important to have additional nutrient or additive information, we need to balance this with what industry can and is willing to do in the short term and what the regulatory implications are. Regulations can take a long time to be finalized.
- g. Incomplete nutrient list is one of the targets of this work, even for macro-nutrients such as fructose.
- h. The data that would potentially be included will be very complex. It is important to note that we are potentially adding tens of thousands of products. Over time, the data quality could deteriorate. It is important that when the data is uploaded, a pilot study must be done to see if it can be added correctly and also to make sure that the new data improves the performance of current reports. Is the data in the database going to get better? New data needs to be examined for the performance.
- i. How is missing data handled in the current database? If there is going to be missing data, will the end user know if they are doing an analysis that a nutrient can't be relied on because there is missing data for certain ingredients. Can something be added to the database that flags missing data so the consumer is aware that the data is incomplete?
- j. The search function and the end user experience are important. Should be user-friendly and as easily accessible as possible.
- k. Using the UPC code as we build this if we can use the GS1 common language, 3rd parties can add volumetrics that will help.
- l. Number of entries could be overwhelming for a small staff. Recommend starting with key foods/top market share products but market share information probably won't be available from the producers. Could the software eventually pull out the top market share products?
- m. Categorization of foods, for example, soups, sauces, and gravies. Can we standardize these categories? Better categorization structure would be helpful.
- n. Blue sky: If any company that provides their label information to the database, they would no longer have to provide the information on the package- could add incentive to companies to include their data. Most consumers have smart phones so they could easily access the database to retrieve label information on the product at point of purchase. Another option would be for companies providing data to the databases and updating on a

regular basis, they would simply need to provide calories per serving or possibly the Facts Up Front key nutrients.

- o. Has there been discussion on how frequently the database will be updated? Once a year? Need more discussion on this.
 - i. Yearly would be great
- p. Consumers are asking for this information more than producers are doing research. Need to respond to them in real time. Industry needs to find ways to get the information out to the public.
- q. Also mindful that SR is used as a research database. Time series over a long period of time is important. There needs to be some considerations of the functions that should be built in for the time series for research purposes.
- r. Incentives for industry- this is a significant financial burden for a company so there needs to be some thought for the benefits for industry to be a part of this. This database has to be the single source of truth so that the number of requests can diminish. This cannot become one more place that industry has to submit data.
- s. We can't control who uses the data, but could require that anyone who uses it includes that the data is from the augmented USDA National Nutrient Database SR Any place that publishes the data could be "registered" so they can be notified when updates happen.
- t. A major fast food restaurant maintains an external website which is updated on a monthly basis. The data is for the public so closing the gap between outdated information is important. How can we closely align so that a company can say their website is updated, and the lag time for updating the SR database is minimal?
- u. What is the best place for the information to reside? Database entries could include links to the source of the data, e.g., for branded products, to the producer's website.
- v. Consider an API application programming interface instead of a bulk data set; people using it could have real time data. This is reasonable to do.

XII. How will success be defined? When will this database actually be usable and will make a difference?

- a. Any step forward would help in our daily work. Implementing any of these recommended criteria would be helpful. It's hard to know which will have the biggest impact and how it will translate to public health.

XIII. Is there prioritization of product categories that should be included in the database?

- a. Retailer data exists that shows the most commonly purchased foods in certain regions. It would be interesting to look at this data and start with those foods.
- b. Foods that contribute the most calories in the daily diet.
- c. Recommend you get the perspective of the consumers and different professional users who are using it.
- d. Apps- what information is going into these apps? What is their focus?
- e. Need to be creative in thinking about potential new business opportunities or ways for industry to appear more marketable or appealing to consumers.

XIV. Proposed Short Term Criteria List from the Criteria Group

- a. **Company brand and private label information**
 - i. This is a concern with private label information
- b. **UPC Code**
 - i. Creates extra work to now have to include this.

- ii. This is technically called the GTIN number.
 - iii. Need to incorporate any changes industry would institute for an expanded GTIN.
 - c. **Ingredient List**
 - d. **Weights and measures (per serving in gram or fl oz. measurements)**
 - e. **Serving Size Information**
 - f. **Nutrition Facts Panel (NFP) and Expanded Facts Panel Data**
 - i. This should include flavonoids and other phytonutrients.
 - ii. Phosphorus is important for a large group of people.
 - iii. The guidelines for nutrition labeling may need to be reviewed/understood and perhaps revised so there is consistency for what goes into the database. One example is how fiber is included or excluded into carbs and kcal.
 - g. **Date stamp or identifier to differentiate formula variations as products enter the marketplace at different times throughout the country dependent on distribution.**
 - h. **Food group classification based on the Dietary Guidelines for Americans**
 - i. There was concern expressed about food group classifications and how it could reveal proprietary information.
 - ii. This should be put on the long term list because it is not reasonable in the short term, information may be proprietary or difficult to obtain for mixed dish products and therefore not available from the producers.
 - iii. How we measure dietary guidance compliance in the US is by having information on the food groups people eat so this is very important.
 - i. Gluten free has become popular and should be considered.
 - j. What is missing from the Short Term List is declaration of the top 8 allergens and gluten-free statement.
 - i. Second the comment on the top 8 allergens and gluten. Growing concern among consumers and manufacturers.
 - ii. There was a concern involving a consumer protection issue about the speed at which ingredients change and consumers with allergies using a website (potentially out of date) to select a “safe” food.
 - iii. Do we want to include the cross contact allergens if it is labeled?
- XV. Proposed Long Term Criteria List from the Criteria Group**
- a. There was a general sense that significant resources would be required to provide this information. It is a big ask to collect information that producers don’t already have. Until there is a government regulation, not all companies will have this type of information.
 - b. **Expanded nutrient profile- begin with the goal to include 33 nutrients included in the USDA CNPP My Plate SuperTracker and expand as appropriate to all possible nutrients**
 - i. How does MyFitnessPal impute their data?
 - 1. It is self-populated by consumers.
 - c. **Non-nutritive components like caffeine**
 - i. Caffeine should move to the short term
 - d. **Analytical (unrounded) data behind NFP**
 - i. This would be particularly useful for *trans* fat information because levels below 0.5 grams are not required to be listed on the label.
 - ii. What benefit is there to the unrounded nutritional data? There are specific rounding rules- is this where we need to spend our time?

- e. **Nutrient Content Claims which appear on the label (e.g., good source claims for a specific food component)**
 - i. You can make nutrient content claims for nutrients not requires on the NFP. However, they do need to have a daily value established.
 - f. **Bioactive components**
 - i. It is not so easy to put bioactive information into the food database. Some may be ok, isoflavones.
 - g. **Added nutrients especially where Upper Level (UL) might be an issue**
 - i. This only applies to fortified nutrients.
 - h. **Fortificants and other additives that affect the nutrient profile i.e., trisodium phosphate**
 - i. **Identify whether nutrients are intrinsic or extrinsic to the food**
 - j. **Software that can capture label images- visual picture of the food**
 - i. It might not be difficult to get an image of the label but it might be difficult to get a picture of the food.
 - ii. It could be difficult to keep label images current.
 - k. **Cost factors important for Thrifty Food Plan under the SNAP program**
 - l. **Preparation instructions**
 - i. Having prep instructions available would allow the database to accommodate the ways a consumer can prepare the product and tailor it to individual dietary needs.
- XVI. With a more robust database, what are some other potential uses the database could be used for?**
- a. Diet tracking
 - b. Country of origin might be an issue for some people, imports
 - i. Any given food product that is marketed may be coming from multiple sources, such as blends of frozen vegetables. Also varies with different times of the year and with the location of different processing facilities, which could cause database to become outdated quickly. Country of origin has the potential for multiplying the data significantly. Does every variable and iteration need to be included in the database? Will it become unmanageable? What is the cost benefit of that amount of data?
 - c. Align with GS1 as they are moving down the path with UPC to manage variance. UPC is already becoming too small so we need to continue to stay in contact with them.
 - d. Have requests on added sugars. Would be great to have.
 - i. In food products where some of the sugar is naturally derived and some is added it become proprietary information. So are we better off (from a research perspective) to have added sugar data where we have it already or just drop it because we can't get the full information.
 - ii. The issue becomes keeping up with rapid reformulations of foods. The responsibility is to continuously update.
 - iii. Could we make the USDA algorithm accessible for calculating added sugars, so companies are not divulging their proprietary information?
 - 1. Could apply on a blanket basis. Added sugar levels could be included from a calculated basis.

2. This is all TBD by the Criteria Group.
- iv. Would have to be some kind of obvious clarification in the SR that the added sugars are calculated values, could be a concern for companies submitting data.

XVII. How do people feel after hearing these comments?

- a. This is an incredibly important initiative. It is important that we all go in knowing the challenges but it is critical that this data set represent the products in the marketplace.
- b. Important to inform public policy.
- c. Would you be willing to pay for user-friendly downloading?
- d. It is time to make a change.
- e. Very positive, headed in the right direction! Definitely complex but for research and consumer needs, more information needs to be available.
- f. This is a critical initiative, appreciate the opportunity to provide input and have an open dialogue.
- g. Anything that can be added is a step forward. From a user perspective, anything is beneficial.

XVIII. Are you committed and supportive enough to be our partner?

- a. The goal is to make this as efficient and low cost as possible. Hopefully there will be no additional work for the providers of the data.
- b. Need to be pragmatic and separate the work between development and adoption. Adoption will be a long road.
- c. It will take resources. Can the PPP create opportunities to share more information about the initiative with key individuals in companies to further share and promote the goals?