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Food Labels as Policy

Why Food Labeling Governs Markets — and Why It Is Never Enough on Its Own

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A policy synthesis drawing on *From Label to Table: Regulating Food in America in the Information Age* (UC Press, 2023) and related publications.

Prepared for food policymakers, regulatory officials, policy analysts, journalists, public-health professionals, and food-governance researchers.

Executive Summary

Food labels are not merely information for shoppers; they are instruments of governance. When a regulator requires a label, it does far more than disclose a fact. It builds a standardized platform that reorganizes markets, changes the products on the shelf, and quietly reassigns responsibility for public-health and food-system problems from institutions to individual consumers. Understanding labels this way — as policy tools rather than neutral windows onto food — is essential for any regulator now weighing front-of-package (FOP) nutrition schemes, date-label reform, ultra-processed-food definitions, sustainability and "clean label" claims, or the rapid spread of the "Nutrition Facts" template into technology and beyond.

Bottom line: labels can standardize markets, discipline marketing claims, and trigger product reformulation — but they cannot substitute for enforcement, institutional trust, or structural food policy. The constructive frame this paper offers is **"labeling-plus-capacity"**: treat every label as one instrument in a portfolio, never as the whole policy.

The historical record assembled in this body of work supports four propositions. **First, labels implement policy through four channels at once**: they steer consumer choice, they induce producers to reformulate products, they create and police market categories, and they make firms accountable to a standard reference. **Second, the consumer-choice channel is the weakest of the four for driving population-level reform.** Labels individualize problems that are collective, work only where shoppers have real purchasing power and alternatives, and assume a rational reading of information that behavioral evidence does not support. **Third, no label is gaming-proof.** Every system the FDA has built — from the food "standards of identity" of the 1930s to today's Nutrition Facts panel — has been worked around by determined market actors. The durable variable is not label design but institutional capacity: trained, funded staff who detect and remove bad-faith products. **Fourth, a label's authority is relational.** Trust in a disclosure depends on trust in the institution behind it, which is why the black-and-white Nutrition Facts panel functions as a "government brand" whose credibility, not merely its data, does the work.

The central caution that follows is that labeling can become a *political opt-out from responsible governance*, an information fix that feels like action while forestalling the harder regulation, enforcement, and structural intervention (on poverty, healthcare access, and the industrial food chain) that the underlying problems actually require. Labels can be powerful complements to such measures; they are poor substitutes for them.

Key recommendations (developed in full in Section 7):

- **Fund the enforcement, not just the design.** Pair every new labeling rule with an enforcement plan: staffing, surveillance, authority to challenge misleading claims, and periodic review.
- **Test labels for real-world interpretation, not just comprehension.** Because trust is relational and consumers read nutrients and ingredients together, evaluate how labels are actually used, not whether a sample can decode them.
- **Prefer mandatory, universal, standardized labels** over voluntary schemes where the public interest is at stake; voluntary labels signal "healthy" and are more easily gamed.
- **Evaluate against outcomes, not comprehension proxies,** including reformulation effects on consumers who never read the label.
- **Name when labeling is the wrong tool,** and pair or replace it with the structural policy that more directly addresses the goal.

1. Introduction: Why Labeling Is a Live Policy Question

Labeling is having a policy moment. The FDA is developing a front-of-package nutrition scheme; Congress has repeatedly considered standardizing food date labels to cut waste; public-health officials are debating how to flag ultra-processed foods; and the iconic Nutrition Facts panel has become a template far beyond the grocery aisle, copied as "Drug Facts" for over-the-counter medicines, the FCC's "Broadband Facts," Apple's privacy labels, and proposals for "AI Nutrition Facts" (Frohlich, *The Conversation*, 2024; Frohlich, *TIME*, 2024). The appeal is bipartisan and intuitive: give people the facts and let them choose.

That intuition rests on a model of labels as neutral conduits: objective facts passing cleanly from an expert sender to a rational receiver. The history of American food labeling tells a more complicated story. Labels are better understood as **information infrastructure**: standardized, mostly invisible systems that structure how an entire market represents, compares, and competes over its products (Frohlich, "Informational Turn," 2017). Like roads or electrical grids, they fade into the background and feel apolitical precisely because they are so pervasive, and that invisibility is a source of power, not a sign of neutrality.

This paper reframes the food label from a **consumer-information device** into a **governance tool** and asks what policymakers should learn from how that tool has actually performed. **For policymakers, the practical question is not whether a label provides information, but whether a labeling regime moves the market in the intended direction, and whether it does so better than the available alternatives.** The argument is not that labels are bad. It is that labels do specific kinds of political work — reshaping markets and relocating responsibility — and that treating them as mere information leads regulators to over-rely on them and to under-invest in the institutional capacity that makes any labeling regime credible.

2. Core Argument: Labels Implement Policy

A food label is a policy instrument because it changes behavior and structure through four simultaneous channels.

Channel	How the label exerts policy effect
Consumer choice	Steers what shoppers buy. Real, but the weakest lever for population-level reform; works best for motivated buyers and those with specific needs.
Producer behavior	Performative: once a value must be disclosed, firms reformulate products toward it. "When food labels are changed, foods changed" (Frohlich, "Informationism," 2021), altering the food supply even for non-readers.
Market categories	Codifies "low fat," "healthy," "natural," "organic," and food-versus-drug — creating the categories firms compete within and around. Classification is itself a market-making act (Frohlich, "Food-Drug Line," 2021)
Institutional accountability	Establishes a mandatory, standard reference firms are accountable to, and a fixed anchor for regulators, journalists, and advocates.

Figure 1. The four channels through which a food label implements policy.

Seen across these channels, a labeling rule is a quiet act of market design. It decides what is made comparable to what, whose claims are privileged, and who carries the burden of judging risk. The seemingly modest move from *setting standards* (defining what a food must be) to *requiring disclosure* (telling consumers what a food contains) was, in this sense, a profound reallocation of governmental power, from the state as a central market-maker to the state as one "information broker" among many (Frohlich, *From Label to Table*).

The limits of consumer choice as a policy mechanism

If labels were simply good information, more of it would mean better outcomes. The historical and behavioral evidence cuts against that "deficit model." The same three limitations keep recurring. **Labels individualize collective problems:** population-level health and environmental harms are addressed through atomized shopping decisions that only aggregate as market data. **Labels presuppose purchasing power and real alternatives:** where those are absent — the lesson of "food desert" research — better information cannot produce better diets. And **labels assume rational use that does not occur:** studies the FDA itself has drawn upon found that nearly half of grocery choices were made in about a second, with shoppers relying on general impressions rather than panel data (Aldrich, *Consumer Use of Information*, 1999).

None of this means consumer information is irrelevant. Labels can be essential for shoppers managing food allergies, medical diets, or religious and ethical commitments, and for motivated comparison shopping. The problem is narrower and more specific: it arises when policymakers treat individualized choice as the *primary* solution to problems that are collective in nature. What behavioral economists call "rational irrationality" is not a glitch to be fixed with clearer design; it shows that labels are, ultimately, about **trust** in the institution that certifies them.

3. Historical and Conceptual Background

From standards of identity to the "market turn"

Beginning in the 1930s, the FDA policed food quality through **standards of identity** — legal recipes defining what a "standard" food (jam, tomato juice, peanut butter) had to contain — in order to prevent "economic adulteration," the quiet substitution of cheaper ingredients. Standards were meant to embody "time-honored" expectations of wholesome food and were hammered out in public hearings where citizens such as Ruth Desmond's Federation of Homemakers argued for common-sense recipes. But for novel processed foods, "time-honored" was hard to define; hearings dragged on for years and

were captured by ingredient lobbies. President Carter famously complained that it should not have taken the FDA twelve years and a 100,000-page record to decide how much peanut there should be in peanut butter (Frohlich, "Cherry Pies," *Washington Post*, 2019).

In the early 1970s, amid the rise of deregulation politics, backlash against "heavy-handed" ingredient bans such as the saccharin and cyclamate episodes, and a broad turn toward private solutions, the FDA pivoted. Its 1973 reforms made an ingredients panel universal, narrowed the use of the punitive "imitation" label, and introduced voluntary nutrition information, freeing companies to market diet and "nonstandard" foods so long as they disclosed contents. FDA Chief Counsel Peter Hutt captured the new logic with his "cherry pie" argument: rather than litigate a quality standard for cherry pie, simply require the percentage of cherries on the label and "let the market test" the recipe by what consumers buy (Frohlich, "Informational Turn," 2017). This was the **informational turn**: the medium of the label substituted for the older market intermediary — the expert gatekeeper — and relocated the work of judging quality onto the shopper.

The food–drug line and the politics of classification

The same period reshaped the boundary between food and drug. The "food-drug line" was not a natural fact, but an institutional construction that, since the 1930s, had to be developed and maintained to mark off risky, tightly regulated drugs from carefree, lightly regulated foods (Frohlich, "Food-Drug Line," 2021). When "functional foods," "nutraceuticals," and fortified products proliferated in the 1990s, industry framed them as an example of "law lag" — new technology outrunning old legal categories. In fact, such products were *designed* to live in the regulatory gap. That dynamic is alive today: the same boundary work runs through current contests over dietary supplements, "food is medicine" products, and the marketing of foods alongside new weight-management drugs. The lesson for debates about ultra-processed foods and "health claims" is that classification is a site of innovation and evasion: wherever a line is drawn, products are engineered to straddle it.

The Nutrition Facts panel as a "government brand"

The 1990 Nutrition Labeling and Education Act made the Nutrition Facts panel mandatory on nearly all packaged foods. Its now-iconic design — staid black Helvetica on white, an authoritative boldface title — was deliberately engineered to read as objective and non-commercial. The designer Burkey Belser described it as a "government brand" whose familiarity lets consumers "absorb it in ways that supersede reading" (Frohlich, *From Label to Table*). Two implications follow. The label's power is **affective and iconographic**, not merely literate, which is exactly why other industries now copy it. And its persuasive authority depends on the perceived neutrality of black-and-white, creating a real design trade-off: interpretive color schemes (traffic-light coding) may improve at-a-glance clarity while eroding the trustworthiness that comes from looking like "this is not advertising."

"Informationism": the concept that ties it together

In plain policy terms, **informationism** is the tendency to treat disclosure as if it were action, to assume that once information has been provided, responsibility has shifted from institutions to individuals. Conceptually, it fuses information *reductionism* with the "conduit metaphor" of information, the assumption that information "is objective and exists independently of human agents" (Tsoukas 1997, quoted in Frohlich, "Informationism," 2021). Informationism treats a label as a self-contained tool and erases the expert translation and framing required to put it there. Its most familiar form in food labeling policy is "nutritionism" (Scrinis 2013): the reduction of food to its measurable nutrient parts. The corrective is to recognize that **a label is a translation, not a transparency**. It does not open a window into the food; it renders the food into a new representation, one that then

pulls the food toward the representation. Because processed foods are easier to reformulate than whole foods, nutrition labeling can perversely encourage *more* processing, even as consumers say they want "clean," less-processed food. The tail wags the dog.

4. Present-Day Policy Relevance

Front-of-package nutrition labeling

FOP labeling is, in the author's framing, an attempt to "extend the brand" of Nutrition Facts to the front of the package. The argument is not that FOP labels should be rejected, but that they should be evaluated as **market-shaping devices**, not merely consumer-education tools. History counsels three cautions. **First, the nutrient/ingredient link.** Consumers do not read nutrition data in isolation from the ingredients list; they treat both as evidence of "health" in a broad sense, using ingredients as a proxy for how processed or "natural" a food is. An FOP study that measures only nutrient comprehension, treating ingredient concerns as "misunderstanding," is designed for a compartmentalized consumer who does not exist (Frohlich, FDA FOP comment letter, 2023). **Second, the "false halo."** Because processed foods are easier to optimize against a nutrient profile, "science-based" FOP claims can certify reformulated ultra-processed products as "healthy," contradicting the FDA's historical "food-first" commitment. **Third, the color-design trade-off** between message clarity and perceived objectivity, noted above.

Ultra-processed foods and "health"

The ultra-processed-food debate is, at root, a debate about whether "health" can be fully captured by nutrient values. Decades of FDA history suggest it cannot: nutritionism systematically advantages the engineered product over the whole food. Any policy that defines healthfulness purely through a label panel risks reproducing that bias unless it explicitly accounts for processing and the ingredient context.

Date labels, waste, and sustainability

Food date labels demonstrate how labeling is sometimes asked to serve goals it was never built for. The century-old, mostly voluntary U.S. dating system grew from two incompatible roots — consumer-facing "use by" dates and retailer-facing "sell by" codes — producing the confusion that drives an estimated tenth of U.S. food waste (Frohlich, "Date Labels," *Washington Post*, 2023; cf. Broad Leib et al., *Dating Game*, 2013.). Here history is encouraging: just as the NLEA eventually mandated a universal Nutrition Facts panel over industry resistance, a mandatory, standardized two-term system ("best if used by" for quality, "use by" for safety) is achievable; the FDA already mandates a "use by" date on infant formula. The date-label fight also illustrates the recurring dispute over **whose responsibility** a problem should be: industry groups prefer voluntary measures and frame waste as the consumer's fault, a familiar move that pushes responsibility downstream. This is also the clearest case in the paper where labeling reform may genuinely be the right tool. The goal is coordination and clarity, not behavior change against a hostile food environment.

The "Nutrition Facts" model beyond food: a cautionary word

As the Nutrition Facts design migrates to Broadband Facts, privacy labels, and proposed AI labels, the precedent from the original Nutrition Facts panel carries a warning the author has stated directly: such labels "can inform consumers, but they may also forestall more serious regulation that is necessary to adequately safeguard the public interest" (Frohlich, *TIME*, 2024). The bland 1973 voluntary nutrition

panel arguably did harm by clearing a path for dubious health hype; adopters in other sectors should not mistake a disclosure label for the regulation a problem may demand.

5. Risks and Limitations of Label-Based Policy

The author's work catalogues a consistent set of failure modes, a "logic of labeling," that recurs across very different schemes (Frohlich, *From Label to Table*; Frohlich, "Informationism," 2021). They fall into three groups.

Consumer-side risks

- **Information overload and consumer burden.** As panels and claims multiply, shoppers face a moralized field of choice without comparable power to shape it.
- **Restless consumption.** Labels can create a cycle in which consumers are continually asked to solve food-system problems through ever more refined acts of shopping, what Lezaun and Schneider (2012) call a *restless consumption*, a never-satisfied search to meet needs that more labels cannot resolve. For example, consumers are expected to be self-taught nutritionists confronting an explosion of choice engineered to exploit an attention-weary public (Frohlich, "Informationism," 2021).
- **Inequality in label use, and the class-based "opt-out."** Labels work through purchasing power, so they segment markets and let the affluent and conscientious buy into a private virtuous market, such as organic, without reforming the conventional one. Such movements can leave a majority of consumer citizens behind and dampen pressure for universal reform (Guthman 2007).

Market-side risks

- **Nichification and the reformulation trap.** If producers optimize for the minority who read labels, they reshape products around that niche while the majority's interests go unaddressed, and "healthy," for example, becomes a moving target chased through reformulation rather than better food.
- **Fragmented and individualized responsibility.** Like cigarette warnings, which helped firms argue smokers had "assumed the risk," labels can transfer liability for systemic harms onto individuals.

Regulatory-side risks

- **Regulatory ambiguity and industry capture.** "Natural," "fresh," and "clean label" remain contested; voluntary schemes and credence claims are especially prone to rent-seeking and to burying information in complex interfaces (e.g., digital GMO disclosure as obfuscation).
- **Path dependency and lock-in.** Because labels are infrastructure, failing systems tend to be patched rather than rethought: when nutrition labels "don't work," the reflex is to make them more prominent (FOP) rather than to ask whether the failure lies beyond the panel itself (Frohlich, "Informationism," 2021).

Underlying all of these is the deepest limitation: **trust is relational, not merely a matter of proof.** Even a perfectly accurate label is read through the consumer's relationship with the institution that stands behind it, and there are always experts "backstage" who frame the label before any choice

is made (Frohlich, *From Label to Table*). No technical fix to design can manufacture that trust; only credible institutions can.

6. Implementation Challenges and Stakeholder Tradeoffs

Any labeling reform must survive contact with the actors who design, contest, and live under it. The framework above does not dissolve these tensions, but it does clarify how to weigh them.

Stakeholder	Core concern	How "labeling-plus-capacity" responds
Industry	Mandatory labels raise costs and may constrain innovation	Real; but mandatory, universal labels also protect honest firms from being undercut, and can be phased in
Agencies / regulators	Limited statutory authority and budget; thin enforcement capacity	This is the binding constraint the paper centers; recommendations target it directly
Public-health advocates	Interpretive FOP labels are needed because shoppers ignore back panels	Supported; if FOP is evaluated as market-shaping and paired with enforcement, not treated as education alone
Anti-regulatory legislators	Labels are less coercive than bans or taxes	True, and a genuine virtue; but low coercion is also why labels under-deliver on collective goals
Equity advocates	Labels may help some while widening gaps if access is ignored	Central concern; labels must be paired with access and affordability policy or they entrench the "opt-out"

Figure 3. Predictable stakeholder objections and how the framework answers them.

Two cross-cutting constraints deserve explicit attention. First, **authority is fragmented:** food labeling in the United States is split across the FDA, USDA, and FTC, overlaid by state law and, for traded goods, international standards, so any scheme needs a coordination plan, not just a design. Second, **compelled and restricted speech face legal limits:** U.S. courts have constrained both what the government can force firms to say and what claims it can bar, as advanced by the legal movement known as *commercial free speech*, seen in the line of health-claims litigation the FDA navigated in the 1990s (the 1999 *Pearson* decision; discussed in Frohlich, *From Label to Table*).

7. Policy Recommendations

The following recommendations translate this historical analysis into operational guidance. They are organized from the most load-bearing (capacity) to the most situational (knowing when not to label). Each pairs the principle with a concrete implementation test.

- **1. Fund enforcement as part of the labeling rule, not as an afterthought.** The most consistent finding across this work is that every labeling system is gamed, so the binding constraint is institutional capacity. Every major rule should arrive with an enforcement plan specifying dedicated staffing, market surveillance, authority to challenge technically-accurate-yet-misleading claims, laboratory or data-verification capacity, complaint pathways, a penalty structure, and scheduled review. "There is no perfect label design, no technical fix" absent "a

competent, staffed agency actively working to make it so" (Frohlich, FDA FOP testimony and comment letter, 2023).

Implementation test: Does the rule name who monitors compliance, how misleading claims will be detected, and what resources are committed over time?

- **2. Test labels for real-world interpretation, not just comprehension.** Because trust is relational, and because consumers read nutrients and ingredients together to judge "health," evaluate how labels are actually used and understood in context. Protect a "food-first" orientation, and study confounding variables (processing, food pairings, cultural context) rather than dismissing them as consumer error.

Implementation test: Does testing measure interpretation and use in realistic conditions, not only whether a sample of consumers can decode the panel?

- **3. Protect the perceived objectivity of public labels.** Weigh interpretive design choices (e.g., color coding) against the trust premium that comes from a label reading as non-commercial. Where both clarity and credibility matter, test the trade-off explicitly rather than assuming more salient always means more effective.

Implementation test: Has the design been evaluated for its effect on trust and perceived neutrality, not just noticeability and comprehension?

- **4. Favor mandatory, universal, standardized labels over voluntary ones** where public health or waste is at stake. Voluntary labels are more easily gamed and signal "healthy" by their mere presence; universality (as with Nutrition Facts and infant-formula dating) both broadens accountability and reduces the "good-by-comparison" halo.

Implementation test: Would a voluntary version primarily reward firms already inclined to comply, leaving the worst actors untouched?

- **5. Evaluate against outcomes and reformulation effects, not comprehension proxies.** Measure changes in the food supply (because producers reformulate toward disclosed values, affecting even non-readers) and in population-level outcomes, not only whether a sample of consumers can read a panel.

Implementation test: Does evaluation track reformulation, product availability, purchasing patterns, and health or waste outcomes, not just consumer understanding?

- **6. Pair labels with the structural policy that more directly addresses the goal** and be explicit about the limits of labeling. Where the real drivers are poverty, healthcare access and quality, or industrial food-chain incentives, a label is at best a complement. Treating it as the whole answer risks an "opt-out from responsible governance" (Frohlich, "Informationism," 2021).

Implementation test: If the label achieved perfect comprehension and use, would the underlying problem actually be solved?

- **7. Guard against copycat overreach and regulatory displacement.** Before exporting the "Facts" template to a new domain, ask whether a disclosure label is being used as a substitute for needed rules.

Implementation test: Is the label being adopted because it is the right remedy, or because it is the politically easiest one?

8. Conclusion

Food labels govern. They reorganize markets, reshape products, create the categories firms compete within, and quietly move responsibility for public problems onto private shoppers. That is why they are so politically attractive — cross-partisan, market-friendly, seemingly modest — and why they are so easy to over-trust. The recurring temptation, visible from the standards-of-identity hearings of the 1930s to today's FOP rulemaking, is to treat the next label as the fix and to skip the harder work behind it.

A more effective framework is **"labeling-plus-capacity."** In it, a label is one instrument in a portfolio, always coupled to (1) funded, expert enforcement; (2) honest evaluation that tracks reformulation and outcomes, not just comprehension; (3) attention to relational trust and to how people actually read food; and (4) candor about when the real levers lie elsewhere, in incomes, access, healthcare, or the structure of the food supply. Used this way, labels can do real good. **The danger is not labeling itself. The danger is asking labels to do the work of food policy without the institutions, enforcement, and structural reforms that make food policy effective.**

About the Author

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