

Obtaining and Using Industry Data

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INTRODUCTION

As a representative of a baby food company for whom accurate nutrient data are a high priority, I would like to give you an idea about why we maintain a nutrient data bank and how we generate nutrient data. These comments may help answer some of the questions we receive about the accuracy of our nutrient data and why complete nutrient data on products are not always available.

For the record, all of the nutrient analyses of Gerber baby foods have been done in-house since we started nutrient analyses of our products in the 1940's. Our nutrient data bank goes back to 1973, when labeling regulations were first implemented. I want to give credit to Wesley Meeuwsen for helping me with this presentation. Wes is the person that answers most of our questions about our nutrient data bank.

WHY MAINTAIN A DATA BANK?

The primary purpose of our nutrient data bank is to provide the best possible data for nutrition labeling of our products. Since baby foods are considered Foods for Special Dietary Use by FDA, they are subject to mandatory nutrition labeling regulations. Compliance with government regulations on labeling is important to our business, so we maintain our data bank as the basis for our label declarations for both FDA and USDA regulated products.

SAMPLING AND ANALYSIS

Gerber analytical laboratories analyze each product every year for all nutrients declared on the label. We follow the FDA protocol for sampling of products, that is, a sample is defined as a composite of twelve containers pulled at random throughout a one-day pack period. Each composite, therefore, represents a single

"sample". We consider data from three "samples" the minimum on which to base a label declaration.

In addition, each product is analyzed every three years for nutrients not declared on the label, i.e., some of the B vitamins and trace minerals.

For cereal products that contain added nutrients, such as iron, analyses are run every four months on a composite of all production packs made during that four-month sampling period.

All of these pieces of data go into the nutrient data bank and are used for several purposes.

HOW IS THE DATA BANK USED?

The primary purpose of maintaining the nutrient data bank is for mandatory nutrition labeling. Any other uses of the data bank must be subordinate to this first priority. Programs are in place to convert the raw data into amounts per serving and percent U.S.RDA for determining label declarations. Nutrient data are reviewed on a regularly scheduled basis and compared to label data. Adjustments of label declarations are made as needed.

The nutrient data bank is also used to annually update **Nutrient Values** handbook, one of Gerber's most widely used publications by health professionals and consumers. **Nutrient Values** contains more nutrient data than is found on the labels; and the data are presented in units per 100 grams as well as in units per serving.

Nutrient data on nutrients that do not appear on the label or in **Nutrient Values**, some of the vitamins and trace minerals, are maintained on a less rigorous schedule than the label nutrients. We use this information to answer special requests from health professionals working out special diets for patients with special needs, from researchers using Gerber foods in a study

who want to calculate nutrient intake data, and from data bank builders who want to include baby foods in their data sets.

It should be made clear that nutrients appearing on the food label are the primary focus. We do not monitor the other nutrients as rigorously because they are not needed for label declarations. Analyses are costly to run, and it is difficult to justify maintaining an expensive analytical program to management if there is no compelling reason to do so, particularly in the current climate of cost reduction and down-sizing. Requests for specialized data are justified for legal or public relations reasons and to aid Product Development in product design. Lack of time and business impact are the primary reasons for the low priority given to sharing nutrient data.

A final use for our nutrient data bank is to support the Gerber Infant Nutrition Survey (INS) which we conduct every three or four years. The INS provides us with dietary intake data for babies two to eighteen months of age. The intake data for Gerber products can be converted into nutrient intake data based on information residing in our nutrient data bank. Nutrient intake data on other food items in the survey data bank are collected based on information from secondary sources rather than direct analysis.

The INS can help us follow trends in infant feeding practices and answer questions about what babies eat, when they eat it, and how much they eat. Outside of Gerber, this information is shared with nutritionists, pediatric audiences and government agencies that have a use for food intake data on infants. Internally, it is interpreted by nutritionists for Marketing and Product Development.

IMPACT OF NEW LABELING REGULATIONS

The FDA labeling proposals and the Nutrition Labeling and Education Act of 1990 have already significantly increased the analytical work load in our laboratories in preparation for the May, 1993, implementation date. Whether foods for infants and toddlers will be required to label all the proposed nutrients is under review. Even if the exemption sought for baby and toddler foods from labeling of select nutrients is gained, we will continue to collect the data to publish in a context that allows for educating the consumer in the different dietary needs of infants and toddlers compared to adults.

SUMMARY

The major use of the Gerber nutrient data bank is to maintain compliance with government labeling regu-

lations. This conference offers us, the users, managers and builders of data bases, the opportunity to understand the similarities as well as the differences in our priorities and goals in the use and maintenance of nutrient data bases.