

# Obtaining and Using Industry Data

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## INTRODUCTION

The current practices at Hershey Foods for obtaining nutrient information for its products and sharing this information with the public -- either through the food label or in brochures -- were covered in an earlier presentation. The impact of NLEA (The Nutrition Labeling and Education Act) and FDA (Food and Drug Administration) proposed regulations on these practices was also discussed. It is inevitable that the builders of nutrient databases will feel the impact of these labeling initiatives in their future requests for data.

This presentation provides more of the details and issues involved in compiling and sharing nutrient information about our products and, when relevant, the impact of mandatory nutrition labeling (Table 1).

TABLE 1

### Compiling and Sharing Nutrient Data

- Data Generation
  - Sample size
  - Sample collection
  - Sample analysis
- Data Reporting
  - Unit of measure
  - Decimal places
  - Rounding
- Data Sharing
  - Company brochures
  - Client forms
- Issues
  - Sample size
  - Serving size
  - Brand names and trademarks
  - Competing priorities

## DATA GENERATION

The nutrition information which appears on the food label ideally is derived from the analytical results of seven production lots (each lot is represented by a composite of 12 samples). Information for nutrients which are provided voluntarily in brochures is usually based on the analytical results from at least three production lot composites.

The collection of a production lot composite requires an interruption in the daily routine and scheduling of plant operations. In the case of multiple manufacturing sites, a decision must be made about how to sample. The nutrition labeling for new products in test market often is based on pilot plant production runs. The production lot composites are prepared by Hershey Foods and sent to a contract laboratory for analysis of all nutrients, except for fatty acids which are determined internally.

The increased expense and product sampling load created by mandatory nutrition labeling will probably result in the analysis of fewer production lot composites, fewer optional nutrients, and fatty acids by a contract laboratory.

## DATA REPORTING

The analytical data for each production lot composite is entered onto a spread sheet in metric units per 100 grams (except vitamin A is entered in IU) to 2-3 decimal places as reported by the lab. A program calculates an analytical mean and 2 standard deviations about that mean. The mean and 2 standard deviations are used to develop nutrient information for the food label and for our nutrient information brochures.

Nutrient information on the food label and in our brochure for consumers is expressed per serving size; the values reflect standard deviation corrections to the analytical mean and rounding according to current

regulations. The nutrient information in our brochure for health professionals is the analytical mean per 100 grams. Values in the latter brochure are reported to the nearest whole number or 1-2 decimal places depending on the nutrient; energy is rounded to the nearest 10 calories. Fatty acid data currently is provided in separate fact sheets but will be incorporated into future brochures.

#### DATA SHARING

Hershey Foods frequently receives requests for nutrient information from nutrient database builders and the staff tries to accommodate these requests. Some want information expressed as the mean per 100 grams; some want it per serving; and others want it both ways. We usually fulfill these requests by providing both of our nutrition information brochures, sometimes supplemented with our fact sheets for cholesterol and fatty acid content.

Often we receive preprinted product forms from database builders with a request to "fill in the blanks" or "check the numbers for accuracy." This does not pose a problem if only a few products are involved; but it is a burden when there are inches of forms. We recently received a request which consisted of 250 pages of product forms, and some of the products were not even ours!

#### ISSUES

In providing nutrient information to database builders, certain issues seem to resurface on a regular basis. One is sample size. We are sometimes asked to share the number of sample analyses used to arrive at a nutrient value. As a matter of practicality and confidentiality, we do not provide that information.

Another issue is serving size. Some request uncorrected nutrient information per serving (i.e., not converted and rounded as shown on the food label). It is difficult to respond to these requests because (1) the data are not readily available in that format and (2) the serving size for a given brand varies as a function of bar weight under current regulations. For example, our standard milk chocolate bar is available in seven sizes, from 0.27 oz. for miniatures to 7.0 oz. for giant; serving size varies from 1.0 to 1.75 oz. (Table 2). FDA's proposal for standard serving sizes will address this particular issue but will then create its own set of problems.

A serious issue is protection of our brand names and registered trademarks. It is absolutely critical that nutrient database builders print our brand names and registered trademarks as exactly indicated. In fact,

they are obligated to do so.

A last and chronic issue is that of competing priorities. Most of Corporate America is staffed leanly today. And we are stretched to the limit, especially now, in tracking the various labeling issues, preparing for mandatory nutrition labeling, and handling ongoing internal requests for services. Fulfilling requests for nutrient information from the builders of databases, unfortunately, is getting buried under an ever growing stack of immediate business priorities.

TABLE 2

#### Bar and Serving Sizes for HERSHEY'S Milk Chocolate Bar

<i>Bar Size</i>	<i>Bar Weight</i> (oz)	<i>Serving Size</i> (oz)	<i>Servings</i> <i>Per Bar</i>
Miniatures	0.27	N/A	N/A
Snack	0.50	1.0	1/2
Standard	1.55	1.55	1
Fund Raiser	2.2	1.1	2
Big Block	2.6	1.3	2
King	4.0	1.0	4
Giant	7.0	1.75	4