

SUPERMARKET SEMANTICS:

The Rhetoric of Food

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Labeling and Advertising

ARISTOTLE PROPOSED this definition of rhetoric: "The faculty of discovering in the particular case all the available means of persuasion." (6, p. xxxvii) The "available means" have been exploited to the fullest (in ways that Aristotle never dreamed) by those who manufacture and market food products today. In many cases they have mastered the sophistic art, which was condemned by Plato, of "making the worse appear the better reason." (7, p. 539)

It should be quite obvious to almost every consumer that an important rhetorical strategy employed by food manufacturers and marketers is that of directing their promotional efforts at consumers' health concerns. These concerns have been heightened in recent years by a stream of pronouncements issuing from numerous government and consumer organizations. Such prestigious groups as the National Research Council, the American Heart Association, the NCEP Expert Panel on Population Strategies for Blood Cholesterol Reduction, the Office of the U. S. Surgeon General, and the National Cancer Institute have all encouraged us to select,

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prepare, and consume foods low in saturated fatty acids, total fat, and cholesterol. We are further reminded that compared to many other countries, children and adults in the U. S. have higher blood cholesterol levels, higher intakes of saturated fatty acids and cholesterol, and higher rates of coronary heart disease morbidity and mortality. (25, p. 4)

Due to extensive coverage by the media, we have become a much better informed public, but also a more concerned public. Articles abound telling us how to maintain healthy eating habits. Some suggestions include: eating a variety of foods; eating foods low in fat, saturated fat, and cholesterol; including an adequate amount of starch and fiber; and avoiding too much sugar and too much salt. (24) While such suggestions for proper eating have been widely publicized, their implementation becomes quite a problem when the average consumer tries to determine the nutritional ingredients of various food products as stated by their marketers. The matter of buying well (in terms of health) is clouded all the more by multi-million dollar labeling and advertising campaigns. Most consumers are perplexed about how to interpret these ads and labels. In response to a comment by John Cooper (Executive VP-General Counsel for Young & Rubicam, New York) about the intelligence and savvy of the American consumer, Nancy S. Wellman, President of the American Dietetic Association, replied, "Let's play fair. Even the most savvy label reader and advertisement reader is being misled today because the whole story isn't being told." (28, p. S-11)

In campaigns to sell food, positively valanced words such as "light," "natural," "fresh," and "wholesome goodness" are often seized upon and applied to food products. Negatively valanced words such as "fat," "cholesterol," "sodium," and "sugar" are played down or turned into an advantage by using the terms with certain negators such as "cholesterol-free," "low-sodium," and so forth. The technical meanings of such descriptors are difficult for even the experts to decipher. "Let the buyer beware" has been a popular maxim since antiquity. However, the warning has become increasingly pertinent when applied to current food advertising and labeling practices. (Note 1)

Caught between the desire to eat nutritional foods on the one hand, and the quagmire of confusion over the meanings of food labeling and advertising claims on the other, consumers become vulnerable to the strategies of marketers who tout their products as beneficial to health. Familiarity with such well-known names as Kellogg, Procter & Gamble, and General Mills tends to build a degree of acceptance, and even trust, in the minds of many customers. After all, these companies have been in business for generations and are a part of our heritage. Add to this the vague feeling held by many that the federal government will protect us from harmful substances in our food products, and you have a public "ripe for the picking." An atmosphere exists in which the average consumer is easy prey for those who "trade on the range of human infirmities." (19, p. 97) Even the FDA's own surveys show that the public does not understand much about the terms used on food labels. For example, only one in eight understood terms like "polyunsaturated fat" and "hydrogenation." (24, p. 39)

While it is true that the U. S. Department of Agriculture, the Federal Trade Commission, and the Food and Drug Administration do occasionally catch and prosecute code violators, the likelihood is far greater that many will never be caught. Those who are caught are heralded in a number of government publications. Two such cases were recently reported. One involved Beech-Nut Corporation. It was found that for years the company had been substituting flavored colored water for apple juice. The company pleaded guilty to 215 felony violations and was sentenced to pay fines totaling almost \$2.2 million. Another case involved M&M Foods of California. The owner was fined \$100,000 and placed on three years probation for allowing meat food products to become adulterated by rodent feces and hair. (16, p. 15)

Although the apprehension and prosecution of food companies who practice such gross violations of the public trust is heartening, the more prevalent and insidious form of deception still flourishes in the area of food advertising and labeling. As many experts have concluded, labeling information as it presently exists is incomplete, lacks uniformity, is misleading, is confusing, and is complex. (29, p. 69) A re-

newed vigor by the FDA and the FTC to find and prosecute those who make false or misleading claims about their food products is encouraging. (5, p. 53) However, it must be kept in mind that policing a \$350 billion food industry each year with a limited staff is a difficult task. Under present government regulations, approximately 30 percent of the food products regulated by the FDA are required to have nutritional labels, another 30 percent carries the information voluntarily, and the remaining 40 percent goes unlabeled. (33, p. 4)

The vast sums of money paid to agencies and individuals to insure that certain food products will sell makes it probable that trickery and deception will continue in spite of intensified efforts by the government. The best talent money can buy is hired to develop slogans, strategies, and labels guaranteed to strike a responsive chord in the minds of consumers. For example, Chesebrough-Pond's Ragu Foods spent approximately \$40 million in twenty-one months to establish the name "Ragu Fresh." As it turned out, the FDA determined the pasta sauce was not fresh. The name of the product was changed. (8, p. 1)

Marketers' strategies are sophisticated, subtle, and effective. They know that such labels as "fresh," "cholesterol-free," "all natural," and "low sodium," will appeal to consumers who are both concerned and confused. The designers of such strategies are aware of USDA, FDA, and FTC regulations. They know what the law says and what it does not say. They are masters at stretching the spirit of the law in order to achieve their own objectives. Ambiguity is their ally and innuendo their weapon. While it is not likely that companies deliberately set out to violate the law, it is probable that the profit motive significantly shapes their interpretation of the law and diminishes their concern for the well-being of the consumer. This does not necessarily mean that a company would use a known poisonous substance as a preservative in its canned vegetables in the place of a nonpoisonous one simply because it was cheaper or easier to manufacture. As a food company spokesman quipped, "We certainly don't want to kill off our customers." (28, p. S-10) However, as the cynically inclined might be tempted to point out, consumers of food products rarely die overnight — it normally takes years

for fat, sodium, and sugar to do serious damage. Therefore, the casualties are not immediately apparent and cause-effect relationships are difficult to establish.

Over and above the health issues involved, current food labeling and advertising practices raise serious ethical questions. The following brief overview of nutritional health claims, followed by several specific cases of false or misleading food claims should bring the problem clearly into focus.

A small trickle of food health claims began in 1984 when the Kellogg Company began selling All-Bran Cereal as a cancer preventative — with the blessing of the National Cancer Institute. The FDA apparently considered taking action, but backed off under pressure from the Office of Management and Budget, which reviews proposed regulations (9, p. 22). The floodgates opened in 1987, however, when, under pressure from the food industry and the White House, the FDA lifted the long-standing ban against using health claims on food labels. Suddenly it was legal to put phrases like "low sodium," "cholesterol free," or "high fiber" on a can of asparagus or on a box of cereal. Such claims worked to the advantage of the marketers, and the sale of some bran cereals rose by as much as 70 percent within two years. (24, p. 36) By 1989, 40 percent of new products and a third of the \$3.6 billion worth of food advertising made such claims, proclaiming the disease preventing qualities of such items as oat bran, fruit juice, and margarine. (30, p. 12) In January, 1990 the American Heart Association unveiled its "HeartGuide" program. For a fee (ranging from \$15,000 to \$640,000) food companies could send their product in for evaluation. If the Association was satisfied that the product met their standards, the company could then place the HeartGuide label on their product. In April of 1991 the FDA finally forced Heart Guide to stop supplying labels to its subscribers. (24, p. 40)

The practice of relating one's product to health/nutrition concerns has developed into a very marketable rhetorical strategy for numerous food companies. Obviously, this is a self-serving practice for those whose goal it is to sell food products. In this connection, a number of ethical problems

will become quite apparent in the discussion of the following cases.

On April 24, 1991, the FDA seized 2,400 cases of Procter & Gamble Company's Citrus Hill Fresh Choice orange juice in a milestone case. The FDA contended that the term "fresh" was false, misleading, and confusing to customers since the product was made from concentrate. Company representative Wendy Jacques said:

We believe our product is properly labeled, but the controversy surrounding this issue, including the FDA's unusual seizure action, has simply made it impossible from a business standpoint to continue to use the term "fresh" on our brand. (5, p. 53)

Five days after the Citrus Hill seizure, Chesebrough-Pond yielded to FDA demands to stop using the term "fresh" in its Ragu Fresh Italian Brand Pasta Sauce. The company relabeled it "Ragu Fino Italian." Company President-CEO Art Gonis said that

Ragu remains convinced that consumers correctly understand our current label as referring to fresh taste only.... We are pleased to have resolved this matter cooperatively with FDA. (8, p. 1)

Actually, the charges by the FDA had been contested by Ragu since August, 1989. (8, p. 1)

Because of much confusion over the meaning of the term "fresh," the FDA has asked manufacturers, packers, and others who label food products and who do not now use the term fresh on their labels to refrain from using the term. The agency first addressed the "fresh" issue fifty years ago, but new technologies and new products have stretched the boundaries of the term's meaning. In the 1940's the FDA agreed to allow the term "fresh frozen" to be used on produce that had been frozen while still fresh. Current guidelines dictate that the term "fresh" should not be applied to foods that have been subjected to any form of heat or chemical processing. (13, p. 6)

The "no-cholesterol" claim is another rhetorical weapon that has been used and abused over the last few years. For example, Peter Pan's creamy peanut butter has the term "No Cholesterol" in bold print on its label. The claim is true as far as it goes. Only animal products contain cholesterol. However, the mere statement of no cholesterol does not necessarily mean that the product is safe and healthy to eat, as many consumers believe. A careful reading of the small print on the jar cap indicates that 76 percent of the peanut butter's calories come from fat. Nutrition experts recommend that no more than approximately 30 percent of our calories come from fat. (32, p. 153)

Promise margarine also claims to have no cholesterol. This, of course, is true of all margarines. The package has a picture of a heart on it; a mention of heart disease; and the slogan, "Get Heart Smart." What the label fails to reveal is that margarine contains roughly 25 percent trans-fatty acids in addition to 18 percent saturated fatty acids, and 57 percent unsaturated fatty acids. (31, p. 196) The trans-fatty acids and some saturated fatty acids can raise blood cholesterol.

The label on Best Foods' new Hellmann's Cholesterol Free Reduced Calorie Mayonnaise tempts customers to "enjoy greater taste that's 100% cholesterol-free, half the calories and low in sodium." Similarly, the label on a competing product, Kraft USA's Miracle Whip Light, also lures consumers with the cholesterol-free promise, adding, "It still has that great tangy zip you love and is delicious on all your sandwiches and salads." But while the label on the Hellmann's jar shows that some saturated fats have been removed, the suggested one-tablespoon serving still gets 90 percent of its 50 calories from fat — and Miracle whip gets 98 percent of its 50 calories from fat. (28, p. S-10)

A box of Quaker Oat Bran contains the words, in large print, "Can Help Reduce Cholesterol." Also added, in smaller print, are the words "when part of a fat-modified, low-cholesterol diet." What this does not reveal is that the people in the study that supports Quaker's claims did show a drop in blood cholesterol averaging 8 percent. However, most of that drop came from strict adherence to a low-fat diet. (32, p. 157) In response to charges against Quaker Oats by the Tex-

as Attorney General, a Quaker spokesman denied the allegations against them regarding their claim that oat bran could reduce cholesterol levels and thereby reduce the risk of a heart attack, citing both in-house and FTC studies that "demonstrate that consumers are not misled by our advertising." (20, p. 2) The Texas Attorney General disagreed saying,

We are concerned that cholesterol ads are escalating. The FTC has not been vigorous in protecting consumers from these kinds of ads. It will be up to the court to decide whether Texas or Quaker is correct in the claims that are made. (20, p. 118)

Another case involved General Mills' Benefit Cereal. As a result of company-sponsored experiments, General Mills claimed a 9 percent reduction in blood cholesterol among people eating the cereal in conjunction with a low-fat diet. Two-thirds of that reduction was attributed to Benefit. (9, p. 22) But when Procter & Gamble attempted to market Metamucil as a cholesterol reducer, the FDA said no. Procter & Gamble then (1989) filed a suit against General Mills, claiming that Benefit was a drug. The cereal is loaded with psyllium, a high-fiber grain grown mainly in India. Procter & Gamble felt that, since Metamucil also contains a heavy concentration of psyllium, they should be allowed to make similar cholesterol reducing claims for their product. However, they were prohibited from doing so. Evidence supplied by Procter & Gamble to support its claims was insufficient said the FDA. Yet, General Mills, using a company-sponsored study from the same laboratory hired by Procter & Gamble, was allowed to make cholesterol reducing claims for Benefit with no interference from the FDA. Procter & Gamble called the inconsistent treatment "blatantly unfair." (9, p. 22)

In a related case Federal District Judge A. Joe Fish recently ruled that the Kellogg Company misrepresented its Heartwise cereal by promoting it as a drug. He continued the ban on its sale in Texas. The state's Attorney General, Dan Morales, charged that in promoting Heartwise, Kellogg did not disclose the health risks of psyllium, a laxative contained in the cereal, and represented the product as being able to re-

duce consumers' cholesterol levels. According to the evidence presented in the case, the high-fiber plant product has been known to cause severe allergic reactions and is not certified by the FDA as safe for use in foods. Morales criticized Kellogg, pointing out that health-conscious consumers are vulnerable to nutritional claims:

It is very disheartening and disturbing when a well-known company intentionally misrepresents its products to the extent that the lives of some persons become endangered. (4, p. 12)

Kellogg spokesman Joseph M. Stewart replied:

We continue to stand behind the accuracy of our advertising. We believe the man (referring to Texas Assistant Attorney General Stephen Gardner) should be acting in a responsible way and has no business attacking our good name. We've taken 85 years to establish our reputation. (4, p. 12)

Closely related to the cholesterol claims are the fat claims. For example, a 16 ounce package of Louis Rich Turkey Bologna has emblazoned on the top of the container, "82% Fat-Free." This would seem to indicate that the meat contains only 18 percent fat and is therefore, a healthy choice. However, this conclusion is not justified. A more thorough analysis reveals that 75 percent of the calories in this meat come from fat. (17, p. 155)

The low-cholesterol low-fat percentages are not the only health claims used by food companies. For example, Campbell Soup Company was recently cited by the FTC for failing to reveal the sodium content of their product in the overall context of their health claims. Specifically, the FTC charged that Campbell ads linking the low-cholesterol, low-fat content of its soups with a reduced risk of some types of heart disease misled consumers because it did not alert them to the soup's high sodium content.

The alleged deception was not failure to disclose the sodium content of Campbell's soups, but failure to disclose that these soups are high in sodium and that diets high in sodium may increase the risk of heart disease. (4, p. 7)

Campbell spokesman James H. Moran said, "We ultimately settled the case in order to avoid the expense and distraction of further litigation. We stand by our advertising." (4, p. 7) Campbell sells about 5 billion cans of soup per year, generating about 65 percent of the \$2.2 billion retail soup market in the United States. (4, p. 7)

Sugar content is another area of concern for many consumers and an area not overlooked by the marketers of various food products. For example, a side panel on a box of General Mills, Cinnamon Toast Crunch cereal features a handy bar graph that favorably compares its sugar content (9 grams per ounce) to that of sweeter cereals. The label reads, "The Wholesome Goodness You Want." Quaker's Tiny Toon Adventures pictures a character yelling, "Hey! There's not much sugar in this cereal!" As proof there is a list of ten other cereals and their sugar content. Tiny Toon is tied for least sweet. Its 10 grams of sugar per ounce looks good next to a carefully culled crop of rival cereals. The fact remains that both Cinnamon Toast Crunch and Tiny Toon are about one-third sugar by weight. (34, p. 447)

General Mills' Trix cereal does list (in small print) the 12 grams per ounce sugar content of their product, aimed primarily at children, but this information is clearly buried beneath a considerable amount of subterfuge. For example, the brightly-colored box, with the picture of a happy rabbit on the front, includes such enticing words as "Natural Fruit Flavors with real fruit juice," "Fruity Sweetened Corn Puffs," "No Artificial Flavors," and "Good source of vitamin C." In light of its alluring appeal to children and its very high concentration of sugar, the cereal seems appropriately named.

Another confusion for the consumer is what might be called the "slight-of-hand" trick. This refers to the manipulation of packages/serving sizes to create the illusion that the amount of fat, sodium, sugar, etc. have been reduced. For example, General Foods USA's Entenmann's no-cholesterol,

low-calorie cherry coffee cake, sold under the theme, "Now you can eat cake," is likely to confuse some consumers who really should not eat much of it. While it is true that each serving contains only 90 calories, and only 20 percent of them are fat, the suggested serving size is only 1.3 ounces. (28, p. 10) The nutritional information on all food products is generally based on the serving size listed on the label. This, of course, is designed to benefit the seller by making the product appear high in nutrition and low in harmful ingredients.

For years numerous individuals and consumer groups have complained about the incomplete information, deception, and distortion occurring in food labeling and advertising, but they have generally met with strong resistance. The National Food Processors, the Grocery Manufacturers of America, and other industry associations have long opposed mandatory nutritional labeling as too expensive. (33, p. 4) However, the new law, which is scheduled to go into effect by 1993, makes labeling mandatory for all processed foods and calls for voluntary labeling of seafood, fruits, and vegetables. It also requires the FDA to define descriptive terms such as "light," "low-fat," "reduced calories," and the like. It will not cover food sold in restaurants and does not cover meat and poultry, which are already regulated by the Department of Agriculture. (24, pp. 36-40)

While we would probably grant that manufacturers, marketers, designers, and advertisers do not set out to deliberately deceive the American public, somewhere between the original intention and the final results, a metamorphosis seems to occur in which those purporting to be concerned about the public welfare become absorbed in a campaign of greed — often at the public's expense. The problem of misleading food claims has gotten so bad that in January, 1990, thirty-four state attorneys general jointly urged the FDA to disallow any type of health claims in food labeling. (28, p. S-10) Consumers Union also submitted recommendations to the FDA at about the same time encouraging the agency to disallow all health claims on foods. (17) In addition, several states have investigated various food health claims and filed law suits charging the companies with false advertising. (20,

p. 2) "Ambiguous" and "misleading" are perhaps the nicest things that can be said about the current state of food labeling and advertising.

The promise of new and improved federal regulations should help, but it is doubtful that legislation alone will solve the problem. Until companies and their promoters are willing to come to grips with the ethical implications of their calculated, sophisticated, and ubiquitous campaigns filled with incomplete, misleading, and questionable information, little improvement is likely to take place. Companies must be willing to balance consideration of the consumers' nutritional needs against their own need to sell the product. If such an unlikely change does not take place, it will be interesting to see what half-truths, illusions, misleading information, or downright lies will replace those currently being employed.

In conclusion, four observations emerge from the study of current policies and practices regarding food labeling and advertising:

(1) The pervasiveness of half-truths, deception, and misleading messages contributes to what Galbraith referred to as "the growth of delusory images" in all areas of our society. In his opinion, these delusory images have spread from the area of marketing to that of domestic and foreign policy and "colors our entire national life with a hue of unreality." (19, p. 97)

(2) A second outcome of these exaggerations is a growing mistrust of those who manufacture and market food products. A recent poll by the Roper Organization revealed that 52 percent of those surveyed indicated that they read food labels for information, but only one in six thinks that advertised health claims are accurate most of the time. Nearly 30 percent think that health claims on food products are almost never true. (24, p. 39) According to the Food Marketing Institute's 1990 survey, only 36 percent of the people surveyed always read ingredients or nutritional information. Interestingly, this study found that people over fifty years old read the labels more than younger people, but are less likely to believe what they read. (24, p. 40)

(3) Testimony from company executives and spokespeople indicate little or no willingness to admit culpability for their actions. There were no remorseful recantations of their

deeds of deception. This is, perhaps, the most disturbing element of all.

(4) Rhetorical strategies will likely be forced to shift when the "Nutrition Labeling and Education Act of 1990" is implemented in 1993. Whether this will benefit the average customer remains to be seen.

It may be, as pointed out by Ronald Gross, that:

The language of ads is language used to sell, language on the make. Its charms and its dangers, like those of the good-hearted whore, whose most ambitious goal is a fur coat, are real but not of ultimate consequence. (19, p. 97)

However, there are many who believe that this particular "good-hearted whore" might be the carrier of a serious social disease.

NOTE

1. No attempt will be made in this article to draw a sharp distinction between "advertising" and "labeling." The difference between the two terms is still a matter of some confusion. According to Ms. Jan Pappalardo of the FTC (27), a 1971 "Memorandum of Understanding" between the FDA and the FTC spelled out that the FDA would have jurisdiction over food labeling and the FTC would have jurisdiction over advertising. However, the difficulty of trying to separate the two terms still persists. For example, do the words "Cholesterol Free" in bold, red letters on a package constitute nutritional information, or is the phrase, in fact, an advertisement for the product? The distinction has become especially blurred in recent years with the plethora of health claims now used on food packages. Both areas will simply be treated here as part of the same problem.

REFERENCES

1. *A Primer on Food Additives*. Department of Health and Human Services, FDA, 5600 Fishers Lane, Rockville, Md. 20857, (October, 1988) pp. 1-7.
2. Benson, James S. "FDA Enforcement Activities Protect Public," *FDA Consumer*: (Jan.-Feb., 1991), pp. 7-8.
3. Brand, David. "Searching for Life's Elixir," *Time Magazine*. (December 12, 1988), pp. 62-69.

4. "Campbell to List Sodium Content in Its Soup Ads," *Marketing News*, vol. 25, No. 10, (May 13, 1991), pp. 7-8 & 12.
5. Colford, Steven W. and Jennifer Lawrence. "FDA Getting Tougher," *Advertising Age*, (April 29, 1991), pp. 1 & 53.
6. Cooper, Lane. *The Rhetoric of Aristotle*. New York: Appleton-Century-Crofts, Inc., 1960.
7. Corbett, Edward P. J. *Classical Rhetoric*. New York: Oxford University Press, 1965.
8. Dagnoli, Judann, and Steven W. Colford, "FDA 'Fresh' Targets Falling," *Advertising Age*, (May 6, 1991), p. 1.
9. "Does This Cereal Belong in the Medicine Cabinet?," *Business Week*, (July 24, 1989), pp. 22-23.
10. *Eating for Life*. Washington, D.C.: U.S. Department of Health and Human Services, June, 1988.
11. *Eating to Lower Your High Blood Cholesterol*. U.S. Department of Health and Human Services, Washington, D.C., (June, 1989), pp. 1-51.
12. "Enforcement Actions," *Food News Consumers*. Washington, D.C.: U.S. Department of Agriculture Food Safety and Inspection Service, vol. 8, No. 1.
13. *FDA Consumer*. Washington, D.C.: Food and Drug Administration. (May, 1991), p. 6.
14. *Federal Register*. Vol. 55, No. 139, Parts II & III, Thursday, July 19, 1990; vol. 54, No. 215, Wednesday, November 8, 1989.
15. Food and Drug Administration. Personal phone conversations with several officials during the month of March, 1991
16. *Food News for Consumers*. Washington D.C.: USDA Food Safety and Inspection Service, vol. 8, No. 1, p. 15.
17. "Forget About Cholesterol?." *Consumer Reports* (March, 1990), pp. 152-157.
18. Gebhardt, Susan E., and Ruth H. Matthews. *Nutritive Value of Foods*. Washington, D.C.: United States Department of Agriculture.
19. Gross, Ronald. "The Language of Advertising," *Language in America*, edited by Neil Postman, Charles Weingartner, and Terence P. Moran. Indianapolis, IN: Pegasus - A Division of Bobbs-Merrill Educational Publishing, 1979, pp. 97-102.
20. Lawrence, Jennifer, and Judann Dagnoli. "States Have Sights On Margarine Ads," *Advertising Age*. Vol. 60, (September 11, 1989), pp. 2 & 118.

21. Lecos, Chris W. *Planning a Diet for a Healthy Heart*: Department of Health and Human Services. Office of Public Affairs, 5600 Fishers Lane, Rockville, MD. 20857, (March, 1987), pp. 1-7.
22. "Making Sense of Food Labels," *Reader's Digest*, (July, 1989), pp. 117-120. Condensed from "The Canyon Ranch Health and Fitness Program," by the staff of the Canyon Ranch and Kathleen Moloney.
23. Moorman, Christine. "The Effects of Stimulus and Consumer Characteristics on the Utilization of Nutrition Information." *Journal of Consumer Research*. Vol. 17, (December, 1990), pp. 362-374.
24. Mueller, William. "Who Reads the Labels?," *American Demographics*, vol. 13, (January, 1991), pp. 36-41.
25. National Cholesterol Program Highlights of the Report of the Expert Panel on Blood Cholesterol Levels in Children and Adolescents, NHBLI Information Center, 4733 Bethesda Avenue, Suite 530, Bethesda, MD 20814, (April 7, 1991), pp. 1-12.
26. "Nutrition and Your Health: Dietary Guidelines for Americans," U.S. Department of Agriculture and U.S. Department of Health and Human Services. *Home and Garden Bulletin No. 232*, Second Edition, 1985.
27. Pappalardo, Jan. FTC employee, Washington, D.C. Information came from a personal phone conversation on March 27, 1991.
28. Pesmen, Sandra. "How Low is Low? How Free is Free.," *Advertising Age*, (May 7, 1990), pp S-10-11.
29. Porter, Donna V., Robert Earl, and John W. Erdman, Jr., "Nutrition Labeling: Comparison of Proposals for Regulatory Reform," *Food Technology*, (January, 1991), pp. 69-75.
30. "Taking a Bite Out of Food Hype," *U.S. News and World Report*, vol. 108, (February 19, 1990), p. 12.
31. "The Trouble with Margarine," *Consumer Reports*, (March, 1991), pp. 196-197.
32. "Using Health to Sell," *Consumer Reports*. (March, 1990), pp. 152-159.
33. Walters, Robert. "Food Label Proposal Taking Too Long," *Daily Star*, Hammond, Louisiana, (Tuesday, April 24, 1990), p. 4.
34. "Wholesomer Than Thou," *Consumer Reports*, (June, 1991), p. 447.

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