

2002-11-01

**Subject: A Public Forum on Efforts to Update Federal and State Packaging and Labeling Laws and Regulations to Give Manufacturers the Option to Voluntarily Label Packages with Only Metric Units**

I support updating Federal and State Packaging and Labeling laws to permit only metric labels. There are two aspects of this Labeling Forum I would like to address.

First, the proposal has already been implemented "de facto" from a consumer perspective with respect to volume. Soft drinks are advertised and labeled on store shelves as "2 liter" bottles. Although current labeling laws require "67.6 fl oz" on the labels, no one advertises or uses "67.6 fl oz" for large soft drink bottles. The "67.6 fl oz" on the label is irrelevant to consumers.

In Michigan, wine is unit priced in metric and has been for at least 10 years. Kroger and Farmer Jack, among the largest grocery chains in Michigan, use \$/liter and \$/100 mL respectively, for unit pricing wine. The wine package, of course, is already in metric units.

Automobile engines are labeled in liters of displacement. Cubic inch displacement is no longer used. Other products advertised in metric units include mouthwash (500 mL, 1 L, and 1.5 L) and bottled water (500 mL and 1.5 L). Thus, consumers are currently familiar with the liter through advertising, package sizes, and unit pricing.

The significant point is that advertisers could have chosen either metric units or fluid ounces or quarts. They freely chose metric to sell their products and label their store shelves. Thus, for some products, metric is the "de facto" label for products sold by volume. Advertisers decided there was no economic penalty or consumer resistance to metric. Otherwise, they would not have used metric in their ads for these products sold by volume.

Second, products sold by mass will need consumer education and examples similar to the 2 L soft drinks to smoothly transition to metric only labels by mass.

There are a number of products currently sold by mass in metric sizes, such as pet food, powdered coffee creamer, and numerous 100 gram food and candy packages. Unfortunately, these products are advertised and labeled on store shelves in ounces and pounds. Thus, the opportunity for consumer education has been ignored for products sold by mass.

Voluntary metric-only labeling is needed to "jump-start" this transition to metric and initiate consumer education. Although gram and kilogram measures are currently included on labels, consumers and advertisers largely ignore them. Until packages appear with only grams or kilograms, probably nothing will change.

Rational metric packages sizes are not included in the scope of this forum. It should be explicitly stated that these proposed changes to labeling regulations do not require rational metric package sizes. However, trade groups should be encouraged to address this issue on a voluntary basis. There are numerous opportunities for cost savings through rationalizing package sizes and commonizing on exportable packages. Common packages with multilingual labels could be used throughout North America.

Industry support for metric only labels is important because that will lead to metric only advertising which results in consumer education.

My recommendations to this Forum are:

1. Permit immediate metric only labeling of products sold by volume.
2. Permit metric only labeling for all other products with a 6 month delay after metric only labels by volume.
3. Initiate consumer education programs during the 6 month phase in delay to prepare consumers.
4. Encourage trade groups to use this opportunity to voluntarily standardize packages to reduce costs as well as educate consumers.
5. Eliminate Federal, State, and local barriers that prevent consumers from making value comparisons in metric units. Some state and local regulations currently require unit pricing in inch pound units only. Grocery chains tend to use the "least common denominator" approach statewide on unit pricing to avoid creating custom labels to comply with local regulations.

Respectfully submitted,

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