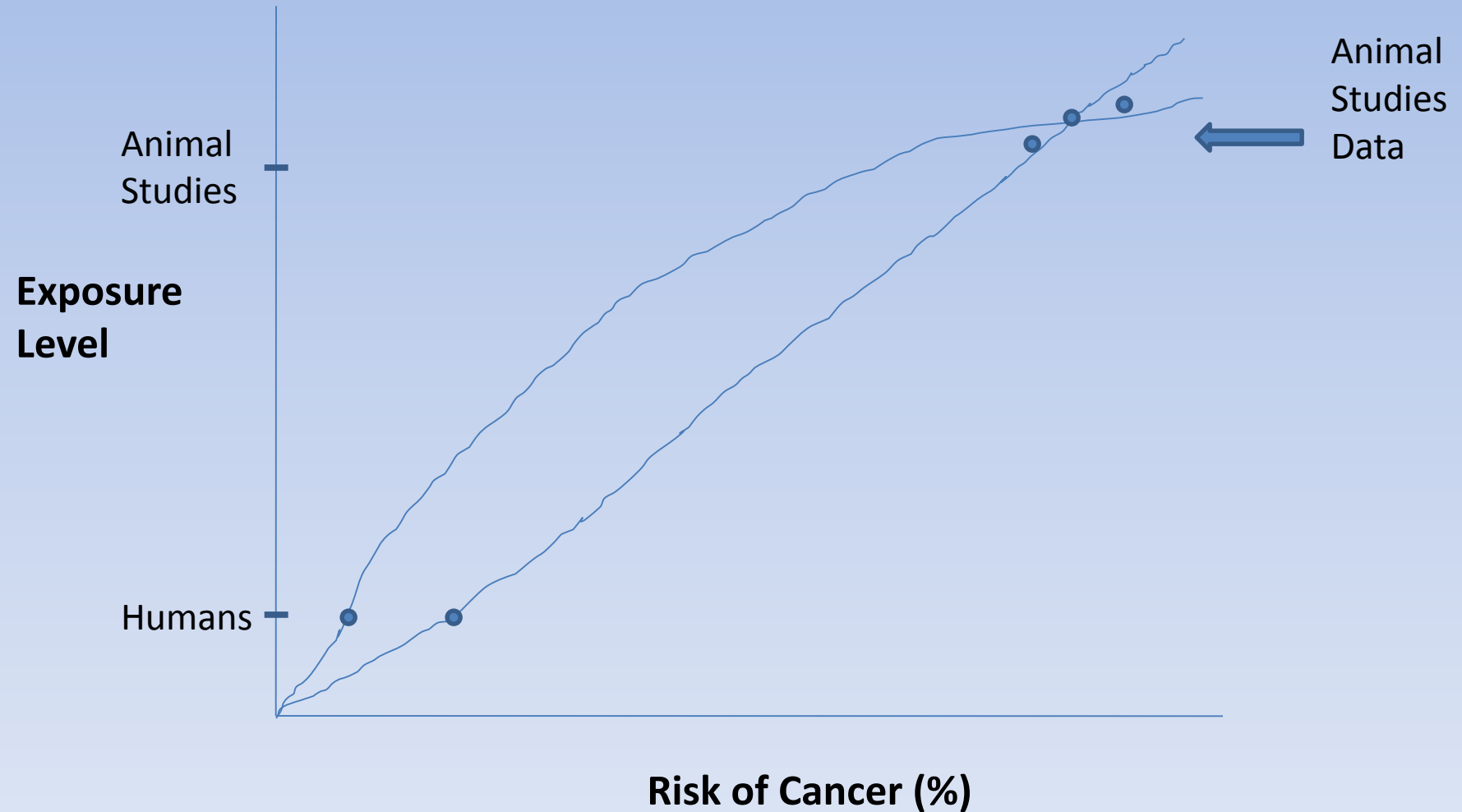


Determining Benefits of Food Label Standards

Label changes → Consumers choose healthier foods → *reduced incidence of disease* → *deaths avoided/life-years gained*

Risk Rates



Arbitrary and Capricious Standard

- Did agency examine relevant data?
- Did agency articulate satisfactory explanation that connects facts/conclusions to policy choice?
- Did agency rely on factors Congress did not intend agency to consider?
- Did agency fail to consider important aspects of the problem?
- Is agency's explanation counter to the evidence?
- Is agency's rationale so implausible could not be ascribed to difference in agency's view?
- Did agency consider all regulatory alternatives?
- Did the agency adequately explain any "flip flops"?