The Institute for Perception

Newsletter

SPRING 2023 • Issue 26 (1)

IN THIS ISSUE

- TECHNICAL REPORT
  Odor and Taste Elimination
  (pages 3-4)
- PRESIDENT'S MESSAGE
- WEBINAR: MARCH 9
  R for Sensory Scientists: Part 2
- APRIL & MAY 2023 COURSES
  - ***Advertising Claims Support***
  - ***Fundamentals of Discrimination Testing and Drivers of Liking®***

Odor and Taste Elimination… (pgs. 3 & 4)

Spring 2023 • Issue 26(1)

Page #

- News & Events 1,2
- March 9th Webinar 2
- Technical Report 3,4
- 2023 April Course 5,6
- Speakers & Registration 7

Technical Reports

2023

26(1) Odor and Taste Elimination

2022

25(4) Sample Selection for Method Comparisons

25(3) Context Effects in Surveys of Subjective Experience

25(2) Drivers of Liking® with Incomplete Block Designs

25(1) Paradoxes in Sensory and Consumer Science

2021

24(3) Optimal Rotations for Incomplete Designs

24(2) *Compared to What?* Controls in Advertising Claims Substantiation

24(1) Generating Optimal Sample Presentation Orders

2020

23(4) Unfolding Financial Markets

The Institute for Perception, founded in 1992, is a full-service research consulting firm offering comprehensive client services to assist in the development process of new and improved products and marketing concepts.

The Institute for Perception

President's Message

Odor and Taste Elimination

Our annual Advertising Claim Support course will be held this year from April 11-13 at The Greenbrier, White Sulphur Springs, WV. This year we will begin with a motivating case involving SC Johnson and Procter and Gamble (P&G). The issue decided by the National Advertising Division and later upheld by the National Advertising Review Board (NARB) involved an odor elimination claim made by P&G. This case had some very interesting aspects that apply generally to claims substantiation. These aspects will be discussed during our April program with input from our scientific and legal teams along with a discussion by NAD attorneys. We will also bring a course to Lausanne, Switzerland, May 23-25. This course will cover Thurstonian models used in Difference Testing and Drivers of Liking®.

Our technical report in this issue is about odor and taste elimination. One application is in the possible elimination of malodors, which we discuss in the report. A second application is in the development of taste blockers to eliminate undesirable sensory effects.

Our future webinars will now be free to attend. Our next webinar on March 9 will be the second part of our "Introduction to R for Sensory Scientists" taught by Will Russ. Part 1 was very heavily attended last month and was a great success. I look forward to seeing some of you at our upcoming courses or at our webinars. Have a great new year!

Best Regards,

Daniel M. Ennis

President, The Institute for Perception

WHAT WE DO:

- **Client Services:** Provide full-service product and concept testing for product development, market research, and claims support
- **Education:** Conduct internal training, external courses, and online webinars on product testing, advanced analytics, and advertising claims support
- **IFPrograms®:** License proprietary software to provide access to new modeling tools
- **Research:** Conduct and publish basic research on human perception in the areas of methodology, measurement, modeling, and prediction

WEBINAR CALENDAR:

MARCH 9, 2023……..... Thursday at 2:00 PM ET, 75 minutes
- **R for Sensory Scientists: Part 2**

EVENT CALENDAR:

APRIL 11-13, 2023……At The Greenbrier, White Sulphur Springs, WV and streamed
- **Advertising Claims Support:** Case Histories and Principles

MAY 23-25, 2023……..At The Savoy Hotel, Lausanne, Switzerland and streamed
- **Fundamentals of Discrimination Testing and Drivers of Liking®**

Detailed information and registration for all courses and webinars are available at www.ifpress.com.

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7629 Hull Street Road • Richmond, VA 23235

WEBINAR: Thursday March 9th at 2:00pm EST
R for Sensory Scientists: Part 2

Taught by: **William Russ**

This webinar builds upon Part 1 which introduced R, a powerful and open-source tool for data analysis. We will extend our capabilities by learning some additional techniques for data cleaning and manipulation. We will also see how we can use custom functions to leverage additional power in running and automating our analyses. All scripts used during the webinar will be shared with participants. Part 1, or previous experience with R, will help to better understand this material.

This webinar is intended for a general audience of sensory professionals and graduate students.

Live via Zoom (FREE) • Recording ($289)

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PROJECT MANAGEMENT

We provide full-service market research including all aspects of a project from design to data analysis and custom results reporting. We conduct market research for clients in a variety of industries including foods and beverages, personal care, home/pet care, pharmaceuticals, cosmetics, and digital services using our global testing network.

Analyses

In addition to standard statistical tools, we have extensive experience in developing and employing advanced statistical analyses and emerging computational tools. These include machine learning methods and predictive modeling, unfolding such as Landscape Segmentation Analysis® (LSA), advanced TURF and other segmentation methods and methods to design optimum product bundles of consumer-relevant drivers.

Study Designs

We use our proprietary experimental design expertise to minimize bias by using optimal rotations in sequential monadic designs.

Reports

Our reports provide insights for varied audiences of business teams in informative and insightful formats. We tell the story of your research findings.

WEBINAR LIBRARY

ORDER RECORDING AT www.ifpress.com/webinars

Sensory Difference Tests
- Replicated Preference Testing to Diagnose Consumer Segmentation
- Introduction to Thurstonian Modeling - 1 & 2
- Advances in Tetrad Testing
- Precision of Measurement in Sensory Difference Testing
- How to Calculate Consumer Relevant Risk using Sensory Difference Tests
- Preference without a Significant Sensory Difference
- Developing Consumer Relevant Action Standards for Sensory Difference Testing
- Discrimination Testing with Batch-to-Batch Variability
- Derived Preference and Difference from Applicability Scoring
- Capitalizing on Historical Consumer Data
- Developments in Discrimination Testing for Sensory Equivalence
- Sensory Discrimination Testing

Advertising Claims Support
- Supporting Numerical Superiority Claims
- Claiming Equivalence, Unsurpassed, and Superiority Simultaneously
- Issues in Supporting "Up-to" Claims
- Supporting Count-Based Sensory Advertising Claims

Drivers of Liking® and Landscape Segmentation Analysis
- Mapping Techniques to Link Consumer & Expert Data
- Maximizing Consumer Insights by Contrasting Blind and Branded Test Findings
- Unfolding Financial Markets
- Preference Mapping vs. LSA
- Capitalizing on Historical Consumer Data
- Drivers of Liking® with Incomplete block Designs and Missing Data

Combinatorial Tools
- Finding new Opportunities using Graph Theory
- Introduction to TURF
- Introduction to Graph Theoretic Tools
- eTURF 2.0: TURF Solution for Datasets of All Sizes
- Large TURF Problems: Finding Custom Solutions

Design Issues in Product Tests and Surveys
- The Science of Answering Questions
- Developments in Applicability & CATA Scoring
- Removing Experimental Biases in Sensory and Consumer Research Data
- Sequential Product Testing

Innovation
- Invention and Innovation

Machine Learning
- Consumer Segmentation via Machine Learning
- Action Standards for Machines and Humans in Quality Assurance
- Test Analysis of Open-Ends
- Turbo-Charging Consumer Analytics - 1 & 2

2023

Issue 26 (1)

Odor and Taste Elimination

Daniel M. Ennis

Background: The National Advertising Division (NAD) is the self-regulatory body for the advertising industry in the US that adjudicates truth in advertising. In May 2022, the NAD issued a ruling that Procter and Gamble's claims that Febreze® eliminates malodor were not supported. They concluded that a purely sensory test is not sufficient to support a claim of physical or chemical odor elimination. According to the decision, the testing conducted was not a good fit for the claims. The ruling was appealed to the National Advertising Review Board (NARB) who upheld the NAD's decision. This case raised interesting questions about how and whether odor or taste elimination claims could be substantiated and, if so, what the testing protocol would require.

Scenario: You work for a company that markets home care products including air, furniture, and fabric care. Your company has developed a product for treating the malodor present on upholstery and would like to make a general claim that the malodors have been eliminated after treatment. Some of the proposed advertising includes depictions of the complete elimination of the malodorants themselves so that no malodor could be detected. Tests on upholstery samples have usually involved treating upholstery swatches with smoke, mildew or pet malodorants. For cigarette smoke malodorants your group usually uses an outside lab that exposes the swatches to live side-stream smoke from a smoking machine designed to mimic the behavior of smokers. Your task is to recommend and execute tests that would determine whether an odor elimination claim can be supported.

Approaches to Eliminate Odors and Tastes: An odorant is a chemical that induces an odor and a tastant is a substance that induces a taste. Correspondingly, a malodorant induces a malodor for a person when detected and is undesirable to that person. Some odors may be malodors to some people but not to others. For example, the smell of freshly cooked sweet corn, which depends on dimethyl sulfide and certain mercaptans, is highly desirable at low concentrations to some people but may be disgusting to people unaccustomed to eating sweet corn. This fact has implications for whether a hedonic or sensory intensity testing method is required. There are three ways that an odor or taste could be eliminated by a consumer product:

a) By blocking the receptor involved in smell or taste in a manner similar to the mechanism by which beta blockers operate on the heart when they compete with adrenaline, but applied to an olfactory or taste receptor,

b) By eliminating all traces of an odorant or tastant from the environment by chemical and/or physical means, and

c) By reducing the concentration of an odorant or tastant below the olfactory or taste threshold of the compound, although the odorant or tastant itself may not be eliminated.

Transduction Mechanisms in Taste and Smell: In 1988 Sir James Black was awarded the Nobel prize in Medicine for the science behind the two blockbuster drugs of the twentieth century: propranolol (a beta blocker) and cimetidine (a histamine receptor antagonist.) His Nobel lecture[2] entitled *Drugs from Emasculated Hormones: The Principle of Syntopic Antagonism* vividly entertained the idea of a two-stage process of fruitful receptor binding without subsequent transducer action and thus separated these two stages. Figures 1 and 2 illustrate the type of cellular events involving a G-protein transduction mechanism that was being considered at the time. In 1983, Black and Leff[3] had published a mathematical model that provides parameters for the two stages called *affinity* and *efficacy* and these refer to the initial receptor binding and the subsequent participation of a transducer, respectively, as shown in Figure 2. The possible common evolutionary ancestry of the mechanisms for heart stimulation, vision, taste, and smell suggested that this two-stage model may have value in modeling the chemical senses, including both smell and taste.

Developing and testing a model for smell and taste in humans poses some serious challenges because human experimentation necessarily involves chemosensory psychophysics. For models extended from pharmacology and applied in the chemical senses to be predictive it would be necessary that they preclude the need to know the precise nature of the relationship between stimulus concentration and perceived intensity. An opportunity to expand and test an extension of Black and Leff's model for single substances[3] to mixtures of sweeteners occurred when DeGraaf and Frijters[4] published experimental results on the points of subjective equality of glucose and fructose mixtures. Plots of equal sweetness of the single substances and mixtures of them are called isoboles[5]. The modeling challenge was to develop equations that included the binding constants for each substance to independent or common receptors along with binding parameters for the subsequent transduction step, if it occurred[5,6,7]. From this research it was shown for the first time that human chemical sensing involves a transducer entity, such as that shown in Figure 2. These models can also be applied in olfaction to malodorants.

Malodor Elimination Project: As you consider the alternatives open to you to determine whether or not you can substantiate the malodor elimination claim, some issues become apparent.

1. Tobacco pyrolysis and smoke generation produce literally thousands of compounds many of which may be malodorous. In order to exploit approach a), it would be necessary to discover blockers for each one of these potential malodorants because of the specialized nature of odor detection to individual compounds in humans. So, clearly this approach is not feasible.

2. The second approach, where your product guarantees the elimination of every trace of every malodorant in the

environment, even those deeply embedded in the upholstery fabric, is also impractical. It is also a fact that your analytical instruments have a detection limit and so malodorants could exist at levels you cannot measure.

3. The third approach, where you would show that the malodorants, although detectable analytically, occur at levels below the detection threshold for humans, seems the most promising. However, you would have to advise that ads that depict the complete elimination of the source of the malodor, the malodorant, could not be supported by this methodology. You would also have the daunting task of identifying all the malodorant compounds in tobacco smoke and for each one show that your product treatment reduced their concentrations below the detection limit. For this reason, you might advise that the advertising claims be limited to only certain important malodorants that are most prevalent and easily isolated.

Why Equivalence Testing is Inappropriate: The ASTM Standard Guide for Sensory Claim Substantiation contains a section on how to conduct and analyze sensory tests for equivalence claims. The Guide provides a specific small level of difference within which equivalence is established.

Inherent in the idea of equivalence is that the two products involved may differ on some sensory attribute but that the difference is not of importance to the average consumer. However, this is not the same as saying that the treatments compared are exactly the same. The equivalence concept does not imply that the source of a malodor is eliminated simply because a fabric swatch treated with the malodorant plus the product is equivalent to an appropriate control. Claims other than odor elimination could be supported, such as a malodor reduction claim about a difference that is not consumer-relevant.

Conclusions: A malodor elimination claim, especially when coupled with a claim that the malodorant itself has been completely eliminated, is an extremely high bar that appears to be impossible to substantiate. More limited claims, such as those focused on particular malodorants or claims concerning a reduction in malodor intensity should be more readily substantiated. The P&G cases before the NAD and NARB highlight the importance of thinking through the issues that may arise when strong claims are made in advertising and the scientific team are required to find support for them. Counseling the business and marketing staff on the issues that may arise in a challenge is an important role that may help to develop claims that are likely to be defended successfully.

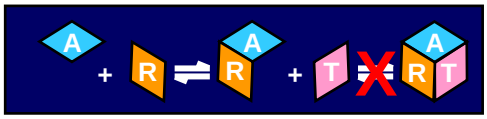

Figure 1. A is a malodorant blocker that has a high affinity for the receptor (R) but cannot interact with the transducer (T), thus preventing cell firing. The malodorant then cannot be detected.

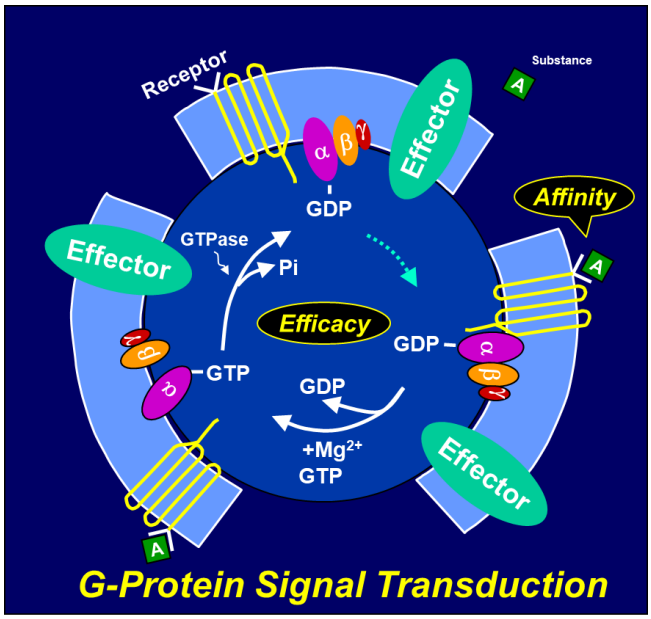

Figure 2. G-protein signal transduction in which a substance (A) such as an odorant binds to a transmembrane receptor leading to an exchange of GTP (guanisine triphosphate) for GDP (guanisine diphosphate) and subsequent activation of an effector such as adenylate cyclase. The receptor may be 7-transmembrane, rather than 5-, as occurs in the chemical senses. Also shown are the two stages labelled *affinity* when initial receptor binding occurs and *efficacy* which involves the participation of the transducer after initial receptor binding.

References and Notes

1. Febreze® is a registered trademark of the Procter and Gamble Company
2. Black, J.W. (1989). Drugs from emasculated hormones: The principle of syntopic antagonism. (Nobel lecture.) *Angew. Chem. Int. Ed. Engl.* **28**, 886-894.
3. Black, J.W. and Leff, P. (1983). Operational models of pharmacological agonism. *Proc. R. Soc. Lond. B.* **220**, 141-162.
4. DeGraaf, C. and Frijters, J.E.R. (1986). A psychophysical investigation of Beidler's taste equation. *Chem. Senses*, **11**, 296-314.
5. Ennis, D.M. (1991) Molecular mixture models based on competitive and non-competitive agonism. *Chem. Senses*, **16**(1) 1-17.
6. Ennis, D.M. (2000). Molecular mixture models: Connecting molecular events to perception. P. Given and D. Paredes, (Eds.), In *Chemistry of Taste: Mechanisms, Behavior, and Mimics*, San Francisco, CA: American Chemical Society.
7. Ennis, D. M. (1996). A general molecular model for the effect of multi-component mixtures on biological systems. *Food Chemistry*, **56**(3), 329-335.

ADVERTISING CLAIMS SUPPORT
Case Histories and Principles

This popular course, now in its 12th year, has been of keen interest to attorneys, market researchers, marketers, business leaders, scientists, product developers and government employees. The purpose of attending this 2.5-day course is to learn the principles that are involved in designing and communicating truthful advertising messages from litigated, regulatory and NAD cases. In the process, you will learn the skills needed to evaluate your own and your competitors' ads. This knowledge will help to avoid vulnerabilities in communicating product benefits and prepare you to participate in countering false advertising claims made by competitors. In the course, you will learn the principles involved in *testing product performance* and *perception surveys* to assess advertising messages.

The speakers include a scientific team with decades of experience conducting and defending claims substantiation research along with a team of NAD attorneys, litigators, in-house counsel, and an arbitrator to discuss cases that illustrate the principles and engage discussion. The course speakers have decades of experience as instructors, scientific experts, jurors, and litigators in addressing claims with significant survey and product testing components.

LIVE STREAM

TUESDAY (APRIL 11, 8am - 4pm ET)

8:00 – 9:00 | Advertising Claims Support

- Introduction and scope of the course
- Claims support in product/brand development
- Admissibility of expert testimony
- Surveys in false advertising and trademark cases
- Efficacy, perception, and materiality

9:10 – 10:00 | Claims and False Advertising; Internal Counsel Perspective

- Three ways an ad can be false
- A typical false advertising lawsuit
- Puffery, falsity, and injury examples:
  - *The Procter & Gamble Co. vs. Kimberly-Clark*
  - *Schick vs. The Gillette Co.*
  - *The Procter & Gamble Co. vs. Ultreo, S.D.N.Y.*
- To sue, challenge, or negotiate - an internal counsel's perspective

10:10 – 11:00 | Motivating Case/ASTM Sensory Claims Guide

- **NAD Case #6977** *(2022)* **and NARB Panel #303** *Procter and Gamble (Febreze®)*
- Review of the ASTM Claims Guide
  - *Evolution of the Guide content*
  - *Choosing a target population, product selection, sampling and handling, selection of markets*
  - *Claims: Superiority, unsurpassed, equivalence, non-comparative*

11:10 – Noon | Test Method, Design, Location, and Participants

- Test options: Monadic, sequential, direct comparisons
- Test design issues: Within-subject, matched samples, position and sequential effects, replication
- Choosing a testing location and test subjects

1) **NAD Case #5425** *Church & Dwight Co.Inc. (Arm & Hammer® Sensitive Skin Plus Scent)*
2) **NAD Case #5782** *The MOMbrands Company (Malt-O-Meal Cereals)*
3) **NAD Case #6041** *Unilever United States, Inc. (Suave Essentials Body Wash)*

Noon – 1:00 LUNCH

1:00 – 3:00 | NAD Mock Hearing; Overview of the NAD

- **NAD Mock Hearing:** General Mills - Yoplait vs Chobani
- Preparing for an NAD hearing

4) **NAD Case #5129** *MillerCoors, LLC (Miller Lite Beer)*
5) **NAD Case #5715** *General Mills Inc. (Yoplait Blended Greek Yogurt)*

3:10 – 4:00 | Sensory and Hedonic Methods

- Methods: Difference, descriptive, hedonic
- Data: Counts, ranking, rating scales
- "Better" and "Greater", hedonic, sensory, and technical claims
- Attribute interdependencies

6) **NAD Case #5866** *Kimberly-Clark Corp. (Huggies Natural Care Wipes)*
7) **NAD Case #5874 and NARB Panel #207** *(2016) Chattam, Inc. (Nasacort)*
8) **NAD Case #5984** *French's Food Company (French's Tomato Ketchup)*

WEDNESDAY (APRIL 12, 8am - 4pm ET)

8:00 – 9:00 | Consumer Relevance

- Setting action standards for consumer-perceived differences
- Linking expert and consumer data
- Clinical vs. statistical significance

Litigated Case: *(S.D.N.Y.) Church & Dwight Co., Inc vs. Clorox Co. (cat litter)*

9) **NAD Case #5974** *Comcast Communications, Inc. (Xfinity Internet, Television & Telephone Services)*

10) **NAD Case #6025** *Bausch & Lomb, Inc. (PeroxiClear Contact Lens Peroxide Solution)*

11) **NAD Case #6131** *Too Faced Cosmetics, LLC. (Better Than Sex Mascara)*

9:10 – 10:00 | Survey Principles

- Answering questions
- Purpose of conducting surveys: Events and behaviors, attitudes and beliefs, subjective experiences
- How respondents answer questions: Optimizing and satisficing
- Filters to avoid acquiescence and no opinion responses
- Survey questions: Biased, open-ended vs. closed-ended
- Steps to improve survey questions

10:10 – 11:00 | Consumer Perception Surveys

- A survey must include: Sample, design, questionnaire, analysis
- Reliability and validity: Ecological, external, internal, face, construct
- Bias: Code, position
- Task instructions – importance and impact
- Data collection methods
- Target universe and size, controls, biased questions, improvements in design and analysis
- Design Issues: Monadic vs sequential monadic (within subject), separating open-ended questions from close-ended
- The stimulus is the label or ad, not the product itself
- Why open-ended questions are not a good basis for quantification
- Common design flaws

11:10 – Noon | How NAD Has Ruled on Perception Surveys

- Consumer takeaway surveys: NAD perspective, critique of cases

12) **NAD Case #5849** *T-Mobile USA (More Data Capacity)*

13) **NAD Case #5926** *Comcast Cable Communications (Xfinity Cable TV)*

14) **NAD Case #6009** *Epson America, Inc. (Epson EcoTank Supertank Printers)*

Noon – 1:00 LUNCH

1:00 – 2:00 | Consumer Takeaway Survey Research

- Independent research on the Bayer Advanced fertilizer case

15) **NAD Case #6033** *Bayer CropScience US (Bayer Advanced 3-in-1 Weed and Feed for Southern Lawns)*

2:10 – 3:00 | Analysis - Interpretation and Communication

- Hypothesis testing
- Determining statistical significance and confidence bounds
- Communicating claim requirements to the business side

16) **NAD Case #5569** *InterHealth Nutraceuticals (Zychrome Dietary Supplement)*

17) **NAD Case #5755** *The Procter & Gamble Co. (Olay Sensitive Body Wash)*

18) **NAD Case #6236** *Abbott Nutrition (Similac Human Milk Fortifier)*

Litigated Case: *(S.D.N.Y.) Avon Products vs. S.C. Johnson & Son, Inc. (Skin-So-Soft)*

3:10 – 4:00 | Test Power

- The meaning of power
- Planning experiments and reducing cost
- Sample sizes for claims support tests
- Managing Risks: Advertiser claim, competitor challenge

19) **NAD Case #6065** *Shell Oil Co. (Shell V-Power NiTRO+ Premium Gasoline)*

20) **NAD Case #6164** *The Procter & Gamble Co. (Finish® Quantum® Max Automatic Dishwasher Detergent)*

THURSDAY (APRIL 13, 8am – Noon ET)

8:00 – 9:00 | Handling No Difference/No Preference Responses

- No preference option analysis
- Power comparisons: Dropping, equal and proportional distribution
- Statistical models and psychological models
- ASTM recommendation

21) **NAD Case #5453** *Ocean Spray Cranberries, Inc. (Ocean Spray Cranberry Juice)*

22) **NAD Case #6037** *Mizkan America, Inc. (RAGUHomestyle Traditional Sauce)*

9:10 – 10:00 | Testing for Equivalence and Unsurpassed Claims

- How the equivalence hypothesis differs from difference testing
- ASTM requirements for an unsurpassed claim
- The paradox of finding support for superiority, unsurpassed, and equivalence; the need for a minimum standard for superiority
- FDA method for qualifying generic drugs: The TOST

23) **NAD Case #5609** *Starbucks Corp. (Verismo Single-Serve Coffee System)*

24) **NAD Case #5822** *Kimberly-Clark Global Sales, LLC (Huggies® Little Snugglers Diapers)*

25) **NAD Case #5829 and NARB Panel #202** *Bayer HealthCare, LLC (Claritin and Claritin-D)*

10:10 – 11:00 | Ratio, Multiplicative, and Count-Based Claims

- The difference between ratio and multiplicative claims
- Examples of multiplicative claims
- Count-based claims

26) **NAD Case #5107** *Ciba Vision Corp. (Dailies Aqua Comfort Plus)*

27) **NAD Case #5416** *LG Electronics USA, Inc. (Cinema 3D TV & 3D Glasses)*

28) **NAD Case #5484** *Reynolds Consumer Products (Hefty® Slider Bags)*

29) **NAD Case #5779** *S.C. Johnson & Son, Inc. (Scrubbing Bubbles Heavy Duty Cleaner with fantastik & Scrubbing Bubbles Bleach 5-in-1 All Purpose Cleaner with fantastik)*

30) **NAD Case #5934** *Rust-Oleum Corp.(Painter's Touch Ultra Cover 2X Spray Paint)*

11:10 – Noon | "Up To" Claims and Conclusion

- Definition and support for an "up to" claim
- FTC opinion on windows marketers claim
- "Up to" energy savings claim at the NAD

31) **NAD Case #5876** *The Procter & Gamble Co. (Duracell Coppertop & Duracell Quantum Alkaline Batteries)*

REGISTRATION

In-person attendance at The Greenbrier.... $2,500
Live-stream attendance $2,300

**A 10% discount will be applied to each additional registration when registered at the same time, from the same company.*

** The Institute for Perception offers reduced or waived course fees to non-profit entities, students, judges, government employees, and others. For more information, please contact us.*

Note: *Continuing Legal Education (CLE) credits will be sought upon request. This program also qualifies for Certified Food Scientist contact hours (CH). CFS Certificants may claim 15 CH for their attendance.*

Fee includes a course manual, and a copy of our latest books. For those attending in-person, also included are food/beverage break refreshments on Tuesday - Thursday, buffet lunch and a group dinner on Tuesday and Wednesday.

Register online at www.ifpress.com/courses

Fee payment can be made online by credit card. If you qualify for a fee discount, or would like information about payment by invoice, please contact **Shannon Denton-Brown** before registering at mail@ifpress.com or call 804-675-2980.

LOCATION

The course will be held at The Greenbrier® in White Sulphur Springs, West Virginia. Nestled in the Allegheny Mountains, this gracious hotel is renowned for its hospitality and service.

LODGING

Lodging is not included in the course fee and participants must make their own hotel reservations. A block of rooms is being held at The Greenbrier at a special rate of **$275** *(plus resort fees & taxes)*. To make a reservation, please call **1-877-661-0839** and mention you are attending the ***Institute for Perception*** course *(**note:** the special rate is not available through online reservations.)* To learn more about The Greenbrier, visit their website at www.greenbrier.com.

TRANSPORTATION

The Greenbrier Valley Airport (**LWB**) in Lewisburg is only a 15 min. shuttle ride from the hotel. Direct flights to LWB are available from Charlotte (**CLT**). Other airports include Roanoke, VA (**ROA,** 1hr. 15 min.), Charleston, WV (**CRW,** 2 hrs.), and Charlottesville, VA (**CHO,** 2 hrs. 15 min.).

CANCELLATION POLICY

Registrants who have not cancelled two working days prior to the course will be charged the entire fee. Substitutions are allowed for any reason.

SPEAKERS

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