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Division of Dockets Management  
HFA-305  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Comments by Citizens for Health  
Submitted via Federal eRulemaking Portal

Docket: FDA-2012-N-1210  
Food Labeling: Revision of Nutrition and Supplement Facts Labels

Ladies and Gentlemen:

Citizens for Health is an organization that advocates for the free flow of information to consumers believing that Consumers have the right to be informed and that sound nutrition information is one of the primary foundations for an informed food consumer.

1. We **support** the proposal of '**Added Sugars**' on the Nutrition Facts label. The more information the consumer has, the better-informed dietary decisions a consumer can make. FDA's rationale for including Added Sugars speaks to just that.

We are proposing mandatory declaration of added sugars on all foods because of (1) the variability in ingredients used, (2) the need for consumers to have a consistent basis on which to compare products, (3) the need for consumers to identify the presence or absence of added sugars, and (4) when added sugars are present, the need for consumers to identify the amount of added sugars added to the food. The mandatory declaration of added sugars may also prompt product reformulation of foods high in added sugars like what was seen when *trans* fat labeling was mandated (Ref. 58).<sup>1</sup>

Empowering consumers with accurate ingredient information will only lead to an educated, independent consumer base.

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<sup>1</sup> Excerpt from Proposed Rule, Federal Register Vol. 79, No. 41, Monday, March 3, 2014, p. 11904.

2. We also **support** the **consumer education campaign** FDA has agreed to host regarding the role of added sugars in dietary planning, and to sponsor **consumer studies** to gather information for future FDA actions on this topic.<sup>2</sup> Education on how to utilize and interpret the information on a nutrition panel, along with the ongoing monitoring of an effort is imperative to ensure the success of improving dietary decisions.

3. We **support** FDA's proposal to include the statements '**Not a significant source of sugars**' or '**Contains less than 1 gram**' if the total content of Added Sugars qualifies under either definition. These statements are succinct and clear, and are a straight forward means to inform consumers that the Added Sugars are under a certain weight.<sup>3</sup>

#### 4. Proposed definition of 'Added Sugars'

In light of the proposed definition of Added Sugars to include numerous types of sugars – brown sugar, corn sweetener, corn syrup, dextrose, fructose, fruit juice concentrates, glucose, high-fructose corn syrup, honey, invert sugar, lactose, maltose, malt sugar, molasses, raw sugar, turbinado, sugar, trehalose, and sucrose – **we respectfully request to include 'nutritive sweetener'** in a parenthetical after Added Sugars, identify the **name of the added sugar**, and if the added sugar is high fructose corn syrup to identify the **percentage of fructose**, in the Nutrition panel.

We believe that listing 'nutritive sweetener,' the name of the added sugar and the percentage of fructose in high fructose corn syrup (*e.g.*, high fructose corn syrup-42 or high fructose corn syrup-55) is essential for the consumer to make a fully informed choice about the caloric contributing sweeteners and the composition of ingredients in the product they are consuming. Identifying each added sugar by name on the panel furthers FDA's stated purpose for including the 'Added Sugar' category on the Nutrition Facts panel. Specifically, the panel could say:

Added Sugar (nutritive sweetener)  
turbinado

Or if more than one added sugar:

Added Sugar (nutritive sweetener)  
fruit juice concentrates  
glucose  
high fructose corn syrup-55

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<sup>2</sup> Excerpt from Proposed Rule, Federal Register Vol. 79, No. 41, Monday, March 3, 2014, p. 11905.

<sup>3</sup> Excerpt from Proposed Rule, Federal Register Vol. 79, No. 41, Monday, March 3, 2014, p. 11906.

Thank you for the opportunity to provide comment in regards to this very important matter.

Respectfully submitted,

*James S. Turner*

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