



American Dietetic Association

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Docket No: 2005P-0325

Request to amend the Food and Drug Administration's regulations related to sugar and alternative sweeteners

The American Dietetic Association (ADA) appreciates this opportunity to provide comments regarding the petition before the Food and Drug Administration to amend its regulations related to sugar and alternative sweeteners. The label is one of the three key communication tools, along with the Dietary Guidelines for Americans¹ and MyPyramid, by which the government ensures that consumers receive credible information about their food choices.

The label is also used by the registered dietitian (RD) for educating and counseling individuals about ways individual foods and beverages can fit into the daily diet to maintain health and to manage chronic diseases in ways that slow the progress of the diseases and conditions and their associated complications. ADA maintains that consumer research is a critical component in the development of truthful and non-misleading food and supplement labels that help consumers make informed decisions about their diets.²

ADA labeling principles inform comments

When considering proposed labeling rules and amendments, ADA uses the following principles to guide its comments. While not exclusive, these do serve as the basic foundation for the Association's comments regarding food and beverage labels:

- A. The label must be truthful and not misleading.
- B. Label claims should be clear and understandable to consumers.
- C. Content on the label should help consumers make informed decisions to build a healthy diet.
- D. Labels should have consistent type and layout formatting so consumers can read them and make product comparisons.
- E. All label claims should include accurate quantitative information about the dietary substance at issue, including percent of Daily Values in a single serving of the product, when known, or the daily dietary intake necessary to achieve the claimed effect.
- F. Consumer research is imperative before making changes to the label.
- G. The label is only a source of information, and thus sustained support for educational programs and individual counseling by registered dietitians is essential.

¹ US Department of Health and Human Services and US Department of Agriculture. Dietary Guidelines for Americans 2005. Available at: <http://www.health.gov/dietaryguidelines/dga2005/document>. Accessed September 21, 2005.

² Ayoob K, Duyff RL, Quagliani D. Position of The American Dietetic Association: Food and nutrition information. *J Amer Diet Assoc.* 2002;102:260-266.

ADA believes that consumer research is critical in determining whether labeling formats and contents are understandable and for ensuring that allowable nutrient and health claims are not misleading. Furthermore, consumers should be able to understand the information in the context of their total diet and their individual health concerns. The following comments are also consistent with ADA's 2004 regarding use of nutritive and nonnutritive sweeteners (attached).³

Request to amend rules related to sugar and sweeteners labeling raises questions

As ADA reviewed the petition, we concluded that it is timely to reflect on the larger issues facing today's food supply and what constitutes a healthy diet. When does it become essential for the FDA to take a risk analysis view in considering new food additives? According to the petition, there are 25 sweeteners either on the marketplace or in development. A Gallop poll sponsored by the Sugar Association suggested that consumers are confused about the various kinds of sweeteners in the foods and beverages they consume, and do not accurately associate brand names with the associated generic names of various non-caloric sweeteners.

While ADA agrees that the public needs access to information about caloric and non-caloric sweeteners, we are not fully convinced that the label is the appropriate vehicle alone to communicate all information involved related to sweeteners. And, we are struggling to identify what would be the best way to convey this information in a useful and authoritative manner, avoiding the aura of alarmist language or imaging. We strongly feel claims for the sugar content of a specific food or beverage product cannot be misleading and without regard to other health benefits inherent in the product or how that product fits within the context of the total diet.

ADA supports the petition. Consumers need to be informed with scientific information in consumer-friendly venues about the sweeteners used in today's food and beverages. ADA also supports ongoing national nutrition monitoring surveys of food and beverage patterns to examine the interactions, both beneficial and detrimental, between caloric and non-caloric sweeteners and consumers' food intake and nutritional health.

ADA offers continuing support for FDA's labeling initiatives

Dietitians play an essential role in helping consumers interpret food labels, integrate them with other tools and information, and apply them in their lives. ADA's members are valuable professionals who can assist FDA in its outreach and educational efforts.

We cannot stress strongly enough, however, that nutrition information on the label provides a basis for, but does not replace, the need for nutrition education or counseling and we lament that pitifully few resources are committed to this second and equal portion of the NLEA. For further information or clarification of the above comments, please contact me at 202-775-8277, ext. 17, or mhager@eatright.org.

Thank you for the opportunity to provide these comments.

Sincerely,

/s/

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/s/

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³ Duffy FB, Sigman-Grant M. Position of the American Dietetic Association: Use of Nutritive and Nonnutritive Sweeteners. *J Am Diet Assoc.* 2004;104:255-275.