



*Domino Foods, Inc.*

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July 21, 2003

By Hand  
Docket Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane  
Room 1061  
Rockville, MD 20852

1271 '03 JUL 21 P4:05

Re: Docket No.'s 02N-0434; 90N-361M  
Withdrawal of Certain Proposed Rules and  
Other Proposed Actions; Notice of Intent

Dear Sir or Madam:

For over 100 years, Domino Sugar has provided American consumers with quality natural sugar (sucrose) products in both crystalline and liquid form. To that end, we have great respect for the Food and Drug Administration (FDA) labeling rules and regulations that provide consumers with accurate product information so that good nutritional and dietary decisions can be reached.

It has come to our attention that the FDA has proposed to withdraw existing "and/or" labeling of sucrose and fructose in soft drinks in the above referenced proceeding. We would support such an action. The distinct labeling of HFCS and sucrose as sweetening ingredients in beverages will be a great assist to consumers who are making choices about their diet and food consumption. This action will also facilitate the efforts of medical and health professionals who are conducting the necessary ongoing research into the ways in which sucrose and fructose are metabolized in the human body. This action will also encourage the accurate collection of reported data on the relative amounts of fructose and sucrose being consumed by the American public.

In summary, Domino Sugar would urge the FDA to withdraw its current permission to allow the "and/or" labeling of beverages and soft drinks, and institute an effective enforcement policy that requires food and beverage manufacturers to indicate on food labels the source of the added sweetener used, whether from fructose or sucrose. This result will be applauded by dietitians, medical professionals and American consumers.

Sincerely,

Brian O'Malley  
President & CEO  
Domino Foods Inc.

02N-0434

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