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

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RE:

Input to Docket No. 94P-0036, Food Labeling: Trans Fatty Acids in Nutrition Labeling, Nutrient Content Claims, and Health Claims: Reopening of the Comment Period

The International Food Information Council (IFIC) Foundation is pleased to have the opportunity to share consumer research we conducted to measure consumer interpretation and use of the proposed trans fat footnote on the Nutrition Facts. The research report, entitled "Impact of Trans Fat Label Information on Consumer Food Choices," is attached for your reference.

This research showed that inclusion of the proposed trans fat footnote goes beyond informing consumers to include trans fat as a factor in their nutrition selection. It conveyed that trans fat be considered as the primary factor in their decision-making, often at the exclusion of other components. As a result, in the presence of the trans fat footnote, when asked to identify the healthier product, consumers selected the product with a less healthful fatty acid profile over a product that contained some trans fats. We would be delighted to have the opportunity to present the findings of this research if desired.

For your background, the IFIC Foundation is the educational arm of IFIC. IFIC's mission is to communicate science-based information on food safety and nutrition to health and nutrition professionals, educators, journalists, government officials and others providing information to consumers. IFIC is supported primarily by the broad-based food, beverage and agricultural industries. We conduct an extensive amount of consumer research to better understand the public's knowledge and attitudes on nutrition and food safety so that our communications meet the needs of our target audiences.

Nutrition information contained on food labels should assist consumers with making purchasing and consumption decisions that promote an overall balanced and enjoyable diet, and should not be cause for confusion or misinterpretation. This report highlights the critical need for conducting consumer research to develop public health messages, particularly on the Nutrition Facts label.

Thank you for this opportunity to share our research and we look forward to answering any questions you may have. We believe that addressing the consumers' need for usable information in the Nutrition Facts panel will accelerate efforts to improve the diet and health of Americans.

Sincerely,

Sylvia Row President and

Susan Borra, RD Senior Vice President,

Director of Nutrition

Lisa Kelly, MPH, RD Director of Public Health

Attachment