



August 19, 2002

Dockets Management Branch
(HFA-305)
Food and Drug Administration (HFS-830)
Room 1061
5630 Fishers Lane
Rockville, MD 20852

NATIONAL
FOOD
PROCESSORS
ASSOCIATION

RE: Docket No. 01N-0548; Food Labeling; Guidelines for Voluntary Nutrition Labeling of Raw Fruits, Vegetables, and Fish; Identification of the 20 Most Frequently Consumed Raw Fruits, Vegetables, and Fish; Proposed Rule. 67 Federal Register 12918, March 20, 2002.

Dear Sir or Madam:

The National Food Processors Association (NFPA) submits the following comments on the docket referenced above.

• NFPA is the voice of the \$500 billion food processing industry on scientific and public policy issues involving food safety, food security, nutrition, technical and regulatory matters and consumer affairs. NFPA's three scientific centers, its scientists and professional staff represent food industry interests on government and regulatory affairs and provide research, technical services, education, communications and crisis management support for the association's U.S. and international members. NFPA's members produce processed and packaged fruit, vegetable, and grain products, meat, poultry, and seafood products, snacks, drinks, and juices, or provide supplies and services to food manufacturers.

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202-639-5900

• NFPA's commends FDA for amending and updating the names and nutrition labeling values for the 20 most commonly consumed raw fruits, vegetables, and fish in the United States. As with nutrition labeling of processed food products, NFPA believes that nutrition information for raw produce and fish is a valuable information tool for consumers to make informed food choices to meet nutrition and dietary needs. We fully support the continuation of this voluntary program.

• The proposed rule solicits input on the effect of FDA's proposal for nutrition labeling of *trans* fatty acids (64 FR 62746, November 17, 1999) on labeling for raw fruits, vegetables, and fish. FDA describes its tentative conclusion at proposed 21 CFR §101.45(a)(3)(iii) to read as follows: "Most fruits and vegetables provide negligible amounts of saturated fat, *trans* fat, and cholesterol; avocados provide 0.5 g of saturated fat per oz." We concur with FDA's tentative conclusion to modify the footnote for raw fruits and vegetables to include *trans* fat.

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Further, FDA has requested comments on whether or not fish (cooked without the addition of any ingredients; e.g., fat, breading, or seasoning) contribute a significant amount of *trans* fat. Based on our review of public and private food composition data, fish provides only negligible amounts of *trans* fat, or no *trans* fat, as defined in the November 1999 proposed rule. As with raw produce, we believe that a similar modification should be developed in regulation for fish. Thus, in anticipation of nutrition labeling requirements for *trans* fats, proposed new 21 CFR §101.45(a)(3)(iv) should be amended to read as follows: "When retailers provide nutrition labeling information for more than one raw fish on signs or posters or in brochures, notebooks or leaflets, the listings for *trans* fat, dietary fiber, and sugars may be omitted from the charts or individual nutrition labels if the following footnote is used 'Fish provide negligible amounts of *trans* fat, dietary fiber and sugars.'"

In addition, the upcoming report from the Food and Nutrition Board, Institute of Medicine, National Academy of Sciences, on Dietary Reference Intakes (DRI) for macronutrients may lead to new requirements being established for nutrients not presently defined by Daily Values (DV) for nutrition labeling purposes. In developing the final rule for voluntary nutrition labeling of raw fruits, vegetables, and fish, NFPA encourages the FDA to consider flexibility for declaration of nutrients that may be defined with by the upcoming DRIs on macronutrients.

NFPA supports the proposed changes in the list of and revised nutrient values for the 20 most frequently consumed raw fish. Further, NFPA requests the addition of Chinook salmon to the revised salmon species. The vast majority of Chinook salmon is sold raw to the U.S. consumer, whereas other species are sold predominantly in processed forms such as canned (Attachment 1). The nutrient profile of Chinook salmon is most similar to the proposed category and values for Atlantic/Coho/Sockeye salmon. Using data from the U.S. Department of Agriculture database for standard reference (Release 14), we have compiled the nutrient profile of a 3 oz. cooked reference amount for Chinook salmon with the proposed categories (Attachment 2).

Thank you for the opportunity to comment on this proposed rule. We support the continuation of the voluntary nutrition labeling program for raw fruits, vegetables, and fish. We look forward to working with FDA on the addition of Chinook salmon to the voluntary nutrition labeling program. Please contact Kenneth Lum, Vice President, NFPA Center for Northwest Seafood, Seattle, Washington (klum@nfpa-food.org; 206-323-3540) or Robert Earl, MPH, RD, Senior Director of Nutrition Policy, Washington, DC (rearl@nfpa-food.org; 202-639-5930) for additional information.

Sincerely,



Rhona S. Applebaum, PhD
Executive Vice President
Scientific and Regulatory Affairs

Attachments

Attachment 1: Chinook Salmon

This information is provided to substantiate the inclusion of Chinook salmon as a subspecies of salmon (with Atlantic/Coho/Sockeye) considered one of the 20 most frequently consumed fish purchased raw in the U.S.

Domestic harvest and value

Data from the National Marine Fisheries Service for 2000 landings of Pacific Salmon show wild Chinook landings of 16.2 million pounds (see table below). While the volume is less than the other commercial species (Chum, Coho, Sockeye, and Pink), the vast majority of Chinook species is sold raw to the U.S. consumer, whereas other species are sold predominantly in processed forms such as canned. It should also be noted that the value of the Chinook species is greater than that of Coho, and nearly the same as Pink Salmon. Statistics were not available for 2001, but domestic wild harvest levels for Chinook salmon are reasonably stable and have averaged 16 to 18 million pounds in recent years.

Year	AFS Species Name	Pounds	Dollars	Price per Pound
2001	SALMON, ATLANTIC	265,113,048	563,985,000	2.12
2000	SALMON, CHINOOK	16,197,799	26,363,096	1.63
2000	SALMON, CHUM	162,341,179	39,243,379	.24
2000	SALMON, COHO	33,868,187	18,075,696	.53
2000	SALMON, PACIFIC	125,809	587,601	4.67
2000	SALMON, PINK	208,201,372	27,094,234	.13
2000	SALMON, SOCKEYE	208,173,008	159,615,844	.77

Sources:

National Marine Fisheries Service.

Atlantic Salmon Data Source: Foreign Trade Division, U.S. Census Bureau. Presented by: Office of Trade and Economic Analysis (OTEAs), International Trade Administration, U.S. Department of Commerce.

Imported Chinook Salmon

The volume of farmed Chinook salmon imported into the United States for raw retail sale has increased dramatically over the past 5 years. Total imports in 2001 were 6.08 million pounds (Data source: National Marine Fisheries Service), and are forecast (SeafoodReport.com, U.S. Imports Edition, Vol. 7 No. 4 - attached) to increase 30% to 7.94 million pounds in 2002. In addition, the U.S. imported 366,784 pounds of wild Chinook salmon in 2001 from Canada for the domestic market.

Total Chinook Salmon for U.S. Raw Retail Market – 2000 and 2001

Total Fresh/Frozen Chinook salmon for the U.S. retail market in 2000 was 20.85 million pounds (Data source: National Fisheries Institute). Total Fresh/Frozen Chinook salmon for the U.S. retail market in 2001 was 22.65 million pounds, an estimate based on actual 2000 catch and imports of farmed and wild salmon reported in the previous paragraph. An increase in retail volume is anticipated due to positive forecasts for farmed Chinook salmon in subsequent years.

USDC Code

Chinook (King) Salmon Farmed

SMA Import Code

302120013

Fresh or Chilled - Except Fillet, Liver, or Roe

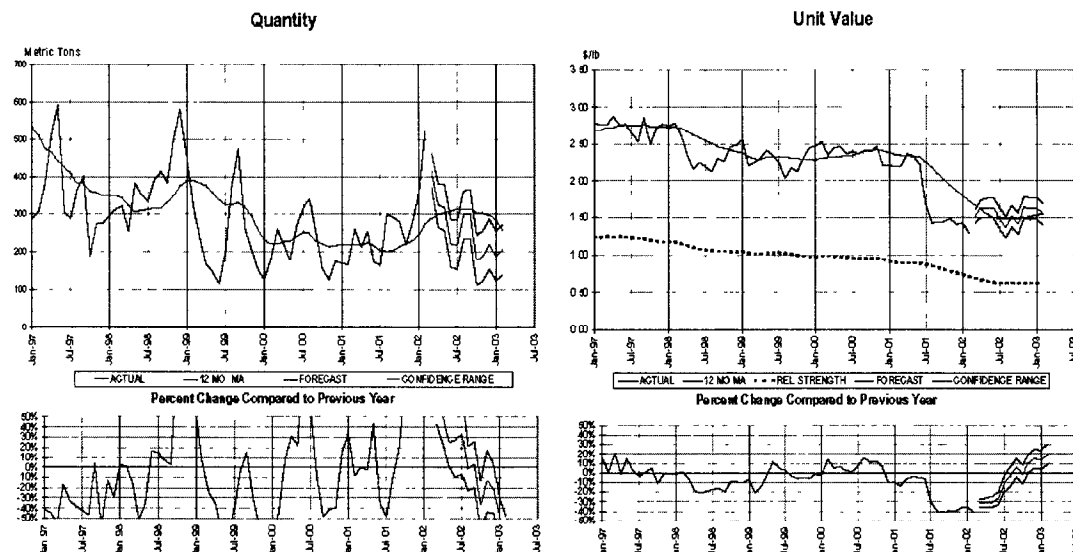
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HIGHLIGHTS

- 2002 quantity is forecasted to be 30% HIGHER, and unit value is forecasted to be 19% LOWER compared to 2001.
- 2002 total quantity is 213.0% HIGHER, and total value is 85.6% HIGHER compared to 2001.
- 2002 total imports from CANADA are 236.3% HIGHER, and total value is 90.5% HIGHER compared to 2001.

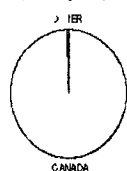
	DEC 2001	JAN 2002	FEB 2002	QUARTERLY FORECAST								ANNUAL	
				ACTUAL 2001 4th QTR	2002 1st QTR	2002 2nd QTR	2002 3rd QTR	2002 4th QTR	2002 Full Year	2002 02 vs. 01			
Quantity (MT)	277	361	520	774	1,300	900	800	800	800	3,600			
% Chg Prev Yr	58.4%	115.3%	213.0%	70%	119%	41%	6%	6%	-22%	30%			
12 Month MA*	230	246	276	700	800	900	900	900	900	3,600			
Value (\$/lb)	\$1.41	\$1.43	\$1.30	\$1.44	\$1.40	\$1.66	\$1.48	\$1.53	\$1.53	\$1.48			
% Chg Prev Yr	-36.2%	-36.3%	-40.7%	-33%	-33%	-33%	0%	6%	6%	-19%			
12 Month MA*	\$1.67	\$1.60	\$1.73	\$1.94	\$1.73	\$1.66	\$1.49	\$1.60	\$1.60	\$1.67			
Rel Strength**	0.76	0.74	0.71	0.76	0.71	0.65	0.62	0.62	0.62	0.65			

* 12 Month Moving Average
** Relative Strength is measured by comparing the product or index unit value to the Aggregate Index unit value.



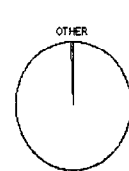
Import Origin	Feb-02				2002 Year to Date						2001 Total			
	Quantity (KG)	Market Share	Qty Chg 2001-02	Unit Value (\$/lb)	Quantity (KG)	Market Share	Qty Chg 2001-02	Value (000's)	Val Chg 2001-02	Unit Val (\$/lb)	Quantity (KG)	Market Share	Value (000's)	Unit Val (\$/lb)
CANADA	518,091	99.5%	282.2%	\$1.30	875,613	99.4%	236.3%	\$2,616	90.5%	\$1.36	2,614,636	94.8%	\$10,614	\$1.84
N ZEA	2,376	0.6%	NA	\$1.06	5,624	0.6%	NA	\$15	0.4%	\$1.19	11,005	0.4%	\$26	\$1.07
NAMIBIA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHILE	NA	NA	-100.0%	NA	NA	NA	NA	NA	NA	NA	133,770	4.8%	\$435	\$1.47
	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL	520,467	100.0%	213.0%	\$1.30	881,037	100.0%	213.0%	\$2,630	85.6%	\$1.35	2,759,410	100.0%	\$11,076	\$1.82

Import Origin Quantity (February 2002)



District of Entry	2002 Year to Date					
	Quantity (KG)	Market Share	Qty Chg 2001-02	Value (000's)	Val Chg 2001-02	Unit Val (\$/lb)
SEATTLE	824,196	93.5%	216.6%	\$2,468	81.9%	\$1.37
OGDENSB	38,404	4.4%	NA	\$88	>1000%	\$1.04
ST ALBN	12,913	1.5%	NA	\$30	>1000%	\$1.04
HAWAII	5,624	0.6%	NA	\$15	>1000%	\$1.19
SAN FRN	NA	NA	NA	NA	>1000%	NA
OTHER	NA	NA	-100.0%	NA	-100.0%	NA
TOTAL	881,037	100.0%	213.0%	\$2,630	85.6%	\$1.35

Import Origin Quantity (Year to Date 2002)



For information regarding this report or custom data reports, please contact *Seafood Market Analyst*, 34 Potter Rd, Wakefield, RI 02879 USA
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			Total fat		Saturated fat		Cholesterol		Sodium		Potassium		Total Carbohydrates		Dietary Fiber		Sugars	Protein	Vitamin A	Vitamin C	Calcium	Iron
	Calories	Cal. Fr Fat	(g)	%DV	(g)	%DV	(mg)	%DV	(mg)	%DV	(mg)	%DV	(g)	%DV	(g)	%DV	(g)	(g)	% DV	% DV	% DV	% DV
Cooked Farmed Atlantic - 3oz	175 10	94 41	10 50	16 15	2 13	10 64	53 55	17 85	51 85	2 16	326 40	9 33	0 00	0 00	0 00	0 00	0 00	18 79	0 85	5 24	1 28	1 61
Cooked Farmed Coho, - 3oz	151 30	62 96	7 00	10 76	1 63	8 13	53 55	17 85	44 20	1 84	391 00	11 17	0 00	0 00	0 00	0 00	0 00	20 66	3 35	2 13	1 02	1 84
Cooked Wild Sockeye - 3oz	183 60	83 93	9 33	14 35	1 63	8 15	73 95	24 65	56 10	2 34	318 75	9 11	0 00	0 00	0 00	0 00	0 00	23 21	3 55	0 00	0 60	2 60
Ave. A/C/S	170.00	80.43	8.94	13.75	1.79	8.97	60.35	20.12	50.72	2.11	345.38	9.87	0.00	0.00	0.00	0.00	0.00	20.88	2.58	2.46	0.97	2.02
Appendix D - Atlantic/Coho/Sockeye	190	90	10	15	2	10	65	22	65	3	320	9	0	0	0	0	0	24	2	2	2	2
Cooked Chum - 3oz	130 90	36 95	4 11	6 32	0 92	4 58	80 75	26 92	54 40	2 27	467 50	13 36	0 00	0 00	0 00	0 00	0 00	21 95	1 94	0 00	1 19	3 35
Cooked Pink - 3oz	126 65	33 81	3 76	5 78	0 61	3 04	56 95	18 98	73 10	3 05	351 90	10 05	0 00	0 00	0 00	0 00	0 00	21 73	2 31	0 00	1 45	4 68
Ave. C/P	128.78	35.38	3.93	6.05	0.76	3.81	68.85	22.95	63.75	2.66	409.70	11.71	0.00	0.00	0.00	0.00	0.00	21.84	2.13	0.00	1.32	4.02
Appendix D - Chum/Pink	130	35	4	6	1	5	70	23	65	3	420	12	0	0	0	0	0	22	2	0	2	4
Cooked Chinook - 3oz	196 35	102 36	11 37	17 50	2 73	13 66	72 25	24 08	51 00	2 13	429 25	12 26	0 00	0 00	0 00	0 00	0 00	21 86	8 43	5 81	2 38	4 30
Appendix D - Proposed Chinook	200	100	11	17	3	13	70	23	50	2	430	12	0	0	0	0	0	22	8	6	2	4