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Division of Dockets Management (HFA-305)
Food and Drug Administration
5360 Fishers Lane, Room 1061
Rockville, Maryland 20852

Docket No. 2003N-0338: Food and Drug Administration Obesity Working Group; Public Meeting

Dear Sir or Madam:

Founded in 1919, the National Restaurant Association is the leading business association for the restaurant industry. Together with the National Restaurant Association Educational Foundation, the Association's mission is to represent, educate and promote a rapidly growing industry that is comprised of 870,000 restaurant and foodservice outlets employing 11.7 million people. As such, nutrition is a priority for our ever-growing industry. We would like to take this opportunity to comment on the Food and Drug Administration Obesity Working Group's role and responsibilities in addressing this issue of nutrition and healthy lifestyles.

We believe that successful efforts to address this issue must focus on the foundation of this issue: education. Without education, the consumers will not know how to incorporate the foods or the myriad of information available to them into a healthy lifestyle. If they did, the Nutrition Labeling and Education Act (NLEA) of 1990 would have clearly impacted the significant public health issue we are still facing today. For years, the American public has been provided with more choices and more information about all the foods they eat at home and in restaurants. Yet we have still seen an increase in obesity rates. All of this information and all of these healthy choices have not proven to be the answer; and consumers seem to be more confused than ever. We are still faced with this complex issue of obesity today.

While it is true that more Americans than in years past seem to express awareness of the important role that balance, moderation and physical activity play in a healthy lifestyle, we as a nation still have a long way to go. Many consumers are demanding more nutritious options, but there is still a great deal of the public who do not have the foundation of knowledge and education to use the nutrition information provided to them. In the final analysis what is presented on a restaurant menu is a direct result of consumer demand. Until consumer demand is impacted by appropriate education, restaurants will have a very limited ability to drive new products.

The National Restaurant Association believes that it is important for the public to receive positive messages about nutrition from responsible officials. The public is often confronted with the mixed messages that they receive on nutrition. Efforts to alienate certain foods and label them as "bad" foods perpetuate the myth that there are "good" foods and "bad" foods.

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Such mixed messages complicate what should be a very consistent message about healthy lifestyles, exercise and personal responsibility. This is why we urge the Food and Drug Administration to provide dietary and lifestyle advice that is consistent, easily understood and applicable to the American public today.


The restaurant industry's objective has always been to provide a wide variety of food options to accommodate the needs of diverse consumers. Americans must be informed over and over again that all foods can be part of a balanced diet. We believe that it is important that as the FDA examines its role and responsibilities in addressing the major public health problem of obesity, you keep in mind that our diverse population is much in need of recommendations that are understandable and relevant to how they live their lives. The clear need is for a consistent message that promotes healthier thinking and lifestyles.

Today, we see more diet-specific items, such as low-carbohydrate, low-fat, and fiber-rich items on menus nationwide, providing options for consumers who are watching their intake of certain nutrients. Understanding the dynamics of these drivers is the key to the FDA understanding and improving the growing obesity rates in the United States. Restaurants everywhere offer numerous market-driven solutions to cater to increasingly health-conscious diners, including increasing efforts to provide what their guests ask for—developing special menu items for those watching their calorie and/or fat intake, providing nutritional information in brochures and on Web sites, and establishing their own initiatives to assist consumers to live a healthy lifestyle.

In the final analysis, we question efforts that focus solely on food or food information alone, without coupling the “calories in” with “calories out.” These efforts to demonize foods or simply provide information without knowledge, understanding and a frame of reference have failed in the past and are doomed in the future. The key is through promotion of healthy lifestyles and genuinely educating consumers. The National Restaurant Association appreciates the opportunity to submit these comments and thanks the FDA for soliciting the opinion of the restaurant industry. Please feel free to call on us with any questions you may have regarding this issue, at (202) 331-5986.

Sincerely,


Lee Culpepper
Senior Vice President
Government Affairs and Public Policy


Steven F. Grover, R.E.H.S.
Vice President
Health and Safety Regulatory Affairs

cc: Steven C. Anderson, CAE, President and Chief Executive Officer
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