

June 1, 2005

Department of Health and Human Services  
Food and Drug Administration  
Division of Dockets Management  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

RE: Docket No. 2001N-0548. Food Labeling; Guidelines for Voluntary Nutrition Labeling or Raw Fruits, Vegetables, and Fish; Identification of the 20 Most Frequently Consumed Raw Fruits, Vegetables, and Fish; Reopening of the Comment Period

Dear Ladies and Gentlemen:

Founded in 1904, the United Fresh Fruit and Vegetable Association (United) is a national trade group representing member growers, shippers, packers, processors, marketers and distributors of fresh produce in the United States. United members provide the leadership to shape business, trade and public policies that drive our industry. Working with thousands of industry members, United provides a fair and balanced forum to promote business solutions; helps build strong partnerships among all segments of the industry, promotes increased produce consumption; and provides scientific and technical expertise essential to competing effectively in today's marketplace.

The fresh fruit and vegetable industry generally supports voluntary nutrition labeling for produce. In fact, the majority of fresh produce is labeled with nutrition information as a result of the Nutrition Labeling and Education Act (NLEA). The Agency is soliciting comments on new data it plans to use to further update current nutrition labeling values for the 20 most frequently consumed raw fruits and vegetables. We strongly believe that the comment period should be extended for a period of one year until June 3, 2006, to afford the affected commodities an adequate opportunity to address this new science.

The proposed nutrition values may have grave implications for some commodities using nutrition data values to substantiate qualified health claims. For example, a slight decrease in the dietary fiber category may cause a product to fall short of being considered a "good source of fiber." With this in mind, it is critically important that each commodity group has enough time to review the proposed new criteria and conduct further research if necessary.

We sincerely hope that you will consider our request for an extension and look forward to working with the Agency as the guidelines are revised. Please don't hesitate to call on us at any time for assistance.

Sincerely,



Robert Guenther  
VP, Public Policy