



DEC 3 2002

Food and Drug Administration
College Park, MD 20740

Arthur G. Epstein, Ph.D.
Chair, the POETS
Pundents Opposing Excessive Table Sugars
P.O. Box 262
Bellevue, NE 68005-0262

Dear Dr. Epstein:

Your letter to President George W. Bush was referred to the Department of Health and Human Services (DHHS), United States Food and Drug Administration (FDA) for a response about your concerns regarding table sugars.

FDA's regulations require that the ingredient statement on a food label list the common and usual name for the ingredients present. The ingredient with greatest amount by weight is listed first. This means that all sugars must be listed by their common or usual name (e.g., high fructose corn syrup) in descending order based on weight. Additionally, the "Nutrition Facts" panel on the food label must declare the total amount of sugar both naturally occurring and added, in grams, contained in a serving of the food.

In the past, FDA has considered recommendations that "added sugars" be declared in the Nutrition Facts panel rather than "total sugars" and that both added and naturally occurring sugars be declared. FDA identified three reasons for deciding against implementing these recommendations: (1) the body does not make any physiological distinction between added and naturally occurring sugars in foods; (2) for most foods there is no analytical method to differentiate between added and naturally occurring sugars; and (3) the declaration of only added sugars could significantly under represent the sugar content of many foods that have a large quantity of naturally occurring sugars. Extensive information about food labeling can be found at FDA's Center for Food Safety and Applied Nutrition's (CFSAN) web site: www.cfsan.fda.gov

FDA has received a citizen petition (Docket No. 99P-2630) from the Center for Science in the Public Interest (CSPI). This petition asks the FDA to establish a Daily Reference Value for "added sugars" in foods and to require that the Nutrition Facts panel include the amount and percent Daily Value of added sugars in a serving. In addition, CSPI requested that FDA change related labeling regulations for nutrient content and health claims. FDA will send a copy of your letter to Dockets Management Branch as a comment to CSPI's citizen petition.

99P-2630

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When the FDA develops a proposed rule to update the nutrition labeling regulations, FDA will consider the recent report of the Institute of Medicine, National Academy of Sciences (IOM/NAS) entitled "Dietary Reference Intakes (DRIs) for Energy, Carbohydrate, Fiber, Fat, Fatty Acids, Cholesterol, Protein and Amino Acids." In its report, the IOM/NAS suggests a maximal intake level of 25 percent of energy from added sugars. This report can be found at www.iom.edu/fnb (click on "Recent Reports").

The Dietary Guidelines for Americans, 2000, jointly published by DHHS and the United States Department of Agriculture (USDA), encourages Americans to achieve a healthy weight and fitness through sensible eating and physical activity. Included in the Dietary Guidelines for Americans is a section that specifically addresses dietary sugars (enclosure). Americans are advised to choose sensibly to limit their intake of beverages and foods that are high in added sugars. The Dietary Guidelines for Americans are revised every five years. You may view and download The Dietary Guidelines for Americans, 2000 at the following website: www.health.gov/dietaryguidelines/

Although nutrition education is a component of FDA's many responsibilities, FDA's major mission is to protect the public health through a regulatory process. Nutrition education for the public is a major responsibility of USDA's Center for Nutrition Policy and Promotion. We will forward your letter to this agency since many of your concerns relate to nutrition education.

Thank you for your interest in the health of the American public. We hope this response provides you with some assistance with your organization's health concerns.

Sincerely,



Kathleen Ellwood, Ph.D.
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Enclosure