



## Produce Marketing Association

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To: [www.fda.gov/dockets/ecomments](http://www.fda.gov/dockets/ecomments)  
Re: Docket No. 2001N-0548

The Produce Marketing Association (PMA) is pleased to submit these comments on the Food and Drug Administration's "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; Reopening of the Comment Period."

PMA is the largest global not-for-profit trade association representing companies that market fresh fruits and vegetables. We represent companies throughout the food distribution chain that market more than 90% of fresh produce sold at the consumer level. We are funded primarily by members' dues, revenues from exhibits, product sales, and meeting registrations.

Like the U.S. government and other health authorities, PMA recommends that consumers eat five or more servings of fruits and vegetables each day. Fresh produce plays an important role in efforts to improve the public's health by offering flavorful, nutritious, and convenient products that will help stem the obesity epidemic.

Accurate nutrition information will help consumers understand this and make healthful food choices at the supermarket. In fact, a 2004 consumer poll by *The New York Times* found that 85% of U.S. consumers read food product labels some or all of the time, and two-thirds said they have used that information to decide whether or not to buy. Clearly consumers are interested in the nutrition content of the foods they buy, and we applaud FDA's efforts to continually refine its data on these commodities.

PMA is concerned about some of the significant changes in nutrition values for key commodities. The agency noted that some of the changes are a result of new data submitted to it and data from the U.S. Department of Agriculture. Although we appreciate the 60-day comment period the agency offered for response to these proposed values, that is not enough time for anyone wishing to do nutrition value research to plan, execute, and evaluate such research. Research for many commodities requires sampling product from different regions at different times of the year to get accurate values. We ask the agency to extend the comment period for 12 months to allow interested parties to conduct such research and submit it to FDA for consideration.

The information provided to consumers must be accurate so that they can make informed decisions, and PMA is concerned with some of FDA's proposed nutrient changes, particularly those that significantly change values in a way that diminishes the nutrition profile of some commodities. We support accurate information, and we commend to your attention the following comments from our members about these changes:

- The U.S. Potato Board calls attention to the Dietary Guidelines, MyPyramid, and other government initiatives to help the public make healthful dietary choices and strongly advises USDA not to take actions that would undermine the public's confidence in the nutrition profile of fresh fruits and vegetables.

- TexaSweat Citrus Marketing, Inc supports the comments made by the Produce Marketing Association and requests a one-year delay to look into the proposed changes specifically regarding grapefruit. Because such drastic changes in Fiber, Potassium and Vitamin C percentages are being proposed, it is only fair to ask that the citrus industry and the association be allowed to work with the FDA and USDA in regard to conducting further research into their proposed changes. Over the course of the year, proposed and current values should be compared to existing research that cites the correct values of the commodity as currently included in the voluntary nutrition label.
- The California Strawberry Commission is concerned with some of FDA's proposed nutrient changes that diminish the nutrient profile of strawberries. In particular, the Commission questions the proposed nutrition label values for sugars, calcium, and iron. The Commission has provided FDA with recent nutritional analysis by Charlene Rainey of Food Research, Inc. to support the Commission's recommendation that the proposed label information be revised to 8g for sugars, 2% DV for calcium, and 2% DV for iron.
- The California Avocado Commission is concerned with FDA's proposed nutrient changes in the areas of saturated fat, fiber, and potassium. The Commission has submitted separate comments to FDA that address these concerns in detail, in which the Commission requested that there be consistency between the FDA values and the USDA nutrient databases. The Commission also supports PMA's request that FDA extend the comment period for 12 months to allow adequate time for additional testing and research.
- The U.S. Apple Association strongly agrees with PMA's request that FDA extend the comment period for 12 months to allow adequate time for additional testing and research. This additional testing will ensure thorough and accurate development of data. In addition, the U.S. Apple Association questions why there was not enough documentation accompanying USDA's data, as required by FDA's guidelines (21 CFR 101.45). As a result, USApple was unable to fully critique the values and compare their data.

PMA members in the service wholesale and retail sectors are key players in the nutrition labeling initiative to inform consumers at point of sale. We appreciate the flexibility of this voluntary regulatory program, and we are proud that our members consistently meet the compliance threshold set by FDA. In addition, our members who supply fresh fruits and vegetables to retail outlets often use the Nutrition Facts boxes on their products and packaging to highlight the positive nutrition contributions their products make.

We will continue to encourage and support our members in this consumer education effort and reach out to consumers ourselves.

PMA appreciates the opportunity to present these comments. We commend the agency for its thorough review of this and other food issues. Please do not hesitate to call upon us if we can be of further assistance. We look forward to working with you.

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