GROCERY MANUFACTURERS OF AMERICA
MAKERS OF THE WORLD'S FAVORITE BRANDS OF FOOD, BEVERAGES, AND CONSUMER PRODUCTS

C. Manly Molpus
PRESIDENT AND
CHIEF EXECUTIVE OFFICER

Mark.

This letter reflects our discussion on the phone (1) GMA will shortly file a petition on low carbs (2) we are commissioning research to get insight on the serving size issue - look forward to working with you on both of these important issues - Best regards - Manly

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C. Manly Molpus
PRESIDENT AND CEO

December 2, 2003

Dr. Mark McClellan
Commissioner
U.S. Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857-0000

Dear Commissioner McClellan:

The Grocery Manufacturers of America and our members that market foods and beverages recognize the need for a clear and consistent definition of carbohydrates in order to accurately label new and existing products to meet consumers' dual demands for food and beverage products and nutrition information that help them make good choices to achieve their diet, weight and health goals.

To that end, GMA will soon submit to the agency a citizens' petition outlining our recommendations for the definition of a low-carbohydrate claim, as first announced during our testimony before the FDA Obesity Working Group on October 23. This action is consistent with FDA's Consumer Health Information for Better Nutrition Initiative, which GMA supports wholeheartedly. Our Nutrition & Labeling Working Group, representing three dozen food and beverage producers, has been actively working on this topic.

As with information on carbohydrates, calorie and serving size information within the Nutrition Facts panel must be conveyed to consumers in a way that is meaningful and relevant to consumers. In order to address emerging questions about consumer perceptions of the Nutrition Facts box, calories and servings sizes, GMA plans to commission consumer research that will explore several points, including:

- How consumers use the food label to obtain calorie information.
- How to more effectively communicate calories in single and multiple serving packages.
- How calorie labeling might impact consumer behavior.
- How consumers react to and incorporate low- and reduced-calorie products in their diets.

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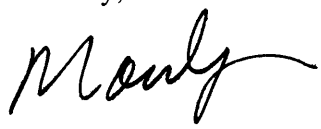
As GMA pursues this research, we believe it would be extremely valuable to collaborate with FDA regarding our research protocol, and hope that this might be possible. When completed, we also hope to work with the FDA to use the findings to develop improved consumer education messages about the caloric value of foods in a way that is applicable to consumers' daily lives

GMA applauds your efforts to provide consumers with better information about nutrition so that they can better choices for themselves. We look forward to our continued partnership with FDA and HHS in achieving our shared goals of combating obesity in particular and assuring good health for all Americans.

Sincerely,



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