

June 24, 2005

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Re: Food Labeling: Serving Sizes of Products that Can Reasonably be Consumed at One Eating Occasion; Updating of Reference Amounts Customarily Consumed; Approaches for Recommending Smaller Portion Sizes Docket No. 24004N-0456

The undersigned scientists urge the FDA to require companies to prominently display both calories *and* the serving size on the principal display panel (PDP) of food packages.

Clearly, the food industry uses prominent disclosures on the front of packages when it wants to highlight calories, carbohydrates, or other nutrients in foods (see attachment). If the FDA genuinely wants to stem the obesity epidemic in the U.S., the agency has to reach consumers who never flip over a package to check the Nutrition Facts label.

Furthermore, FDA could use the front label to clarify the food's serving size. Many consumers misinterpret the calorie content of a food because they neglect to check the serving size or the "servings per container." If consumers don't know the serving size, the Nutrition Facts label can be useless or misleading.

We recommend that the front label state the serving size in cups, tablespoons, slices, or other easily understood units. However, for foods that contain only a few servings per package, the serving size should be either the entire package or a fraction of a package so consumers don't assume that the entire package is a single serving. For example, the following disclosures (which use FDA-mandated serving sizes) might be appropriate:

Food	Front Label Disclosure
Marie Callender's Chicken Pot Pie	520 calories per 1/2 pie
Stouffer's Macaroni & Cheese	320 calories per 1/2 box
Maruchan Ramen Noodle Soup	190 calories in 1/2 package

The nation's obesity epidemic is complex and not easily remedied with one or two actions. However, the simple, inexpensive measure that we propose could help focus the public's attention on calories and serving sizes.

2004N-0456

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Respectfully submitted,

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