

# Good Housekeeping

250 WEST 55TH STREET, NEW YORK, NY 10019 \* 212-649-2000 \* FAX 212-649-2378

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6/2/2005

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

Dear Sir or Madam:

As Director of Nutrition for the Good Housekeeping Institute, I wish to respond to the request for comments on the Food and Drug Administration's (FDA) Advance Notice of Proposed Rulemaking (ANPRM) below.

## **[Docket No. 2004N-0463] Food Labeling; Prominence of Calories**

### A. Questions Concerning Prominence of Calorie Information on Food Labels

Steps need to be taken to ensure that calorie information is available in an easy-to-read format. The first step we recommend is giving more prominence to the calories per serving by increasing font size and using bold type. Currently many consumers who are interested in this information may not be able to utilize it simply because the font is too small to read. A % DV (daily value) for calories should also be added, since % DV is already given for other nutrients and is thus an inherent part of the food label.

### B: Questions Concerning "Calories from Fat"

The listing of total calories from fat is not necessary to assist consumers in maintaining healthy diet practices. Current scientific knowledge does not support the need for restriction of total fat intake except as a way to reduce calories. However, many consumers still are confused about the importance of fat and still perceive a food with low fat calories as being a healthy choice. So seeing the calories from fat disclosure on the label does not provide useful information and is likely to divert their attention from the food's total calories.

### C. Questions About Use of Caloric Information on Food Labels

Informal observations/discussions with consumers here at Good Housekeeping Institute suggest that displaying the number of calories per serving on the principal display panel (PDP) would affect decisions on whether to eat a food or on how much of that food to eat. Consumers must make a conscious decision to read the Nutrition Facts Panel (NFP). Those who are not actively trying to monitor their caloric intake can easily buy a product and consume it without being aware of its caloric content. In contrast, having the calorie content displayed on the PDP means that the consumer would instantly see this

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information at first glance. While some consumers will remain totally uninterested, others will modify their behavior when confronted with the facts. However, care must be taken to assure that consumers link the calorie disclosure with the correct portion size. Perhaps this could be done graphically using household measures (cup, half-cup, tablespoon, etc.).

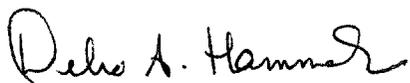
**[Docket No. 2004N-0456] Food Labeling: Serving Sizes of Products That Can Reasonably Be Consumed At One Eating Occasion; Updating of Reference Amounts Customarily Consumed; Approaches for Recommending Smaller Portions.**

**B. Single-Serve Containers**

Good Housekeeping encourages FDA to initiate rulemaking to require packages that can reasonably be consumed at one eating occasion to provide the nutrition information for the entire package. While some companies have complied with FDA's March 12, 2004 request that they label food packages as containing a one serving if the entire contents can reasonably be consumed at one sitting, many others have not. We found numerous examples of foods which were obviously intended to be single-serve items but based their nutrition information on multiple servings. We reported on a few of our findings in the August 2004 issue of Good Housekeeping (attached). For example, a 20-ounce fortified beverage listed calories only for an 8-ounce serving but listed vitamins for both the 8-ounce serving and the whole 20-ounce bottle. Currently, labeling for this product has not changed and, we feel, is still misleading.

Thank you for your consideration of these important issues.

Sincerely,



Delia A Hammock, M.S, R.D.  
Nutrition Director  
Good Housekeeping Institute

# TESTING TESTING!

NEWS FOR YOU FROM THE GOOD HOUSEKEEPING INSTITUTE



PHOTOGRAPHS, CLOCKWISE FROM BOTTOM LEFT: MARY ELLEN BARTLEY; CREATAS, DAVID LEWIS TAYLOR (RIBBONS BY STEVE COLE/PICTUREQUEST).

## The safest pool alarms

Drowning is the second leading cause of accidental death in kids under age five, and many of these fatalities happen in residential pools. In 2002, ASTM International released voluntary standards for in-pool safety systems. These devices are supposed to ring loudly when a child falls into the water. To comply, alarms must meet tough criteria for sensing motion.

But be careful what you buy. Of the three models

GHI engineers tested, only the Poolguard PGRM-2 claimed to meet the new standards, and it passed our tests: The device sounded off within the required 20 seconds each time a child simulator was dropped into a normal-size backyard pool. Another model, the Smart Pool, took longer than 20 seconds to ring, and the Pool SOS alarm that we bought was defective. The bottom line: You need a system that meets the new standards.

## Raves for new manicure magic

CoverGirl claims that its new Continuous Color Nails gives you nail polish and both other coats (base and top) all in one bottle. To test this out, GH Institute volunteers used the CoverGirl product on one hand, then applied the usual three separate coats of another brand to the other hand. In terms of the polish's appearance, chipping, and overall wear and tear, nearly all testers rated CoverGirl equal to or better than the three-step system. "It was easy to apply, had great shine, and lasted longer than most polishes," said one fan. And at \$2.99, it saves more than just time.



## TASTE TEST

### Carb-cutting beers

Thanks to brews that are weight-loss friendly, dieters everywhere can pour themselves a cold one. But which low-carb brand is best? When it comes to taste, men and women often disagree—so we pitted 50 beer-loving staffers against each other in a brewski battle of the sexes.

**THE WINNERS** Women loved IC Light for its "crisp, well-balanced flavor," while men liked the "strong, smooth taste" of Miller Lite. Both IC Light and Miller Lite have fewer carbs than regular beer does (3 grams versus about 13), and they cost around the same as traditional brews. —Anthony Losanno

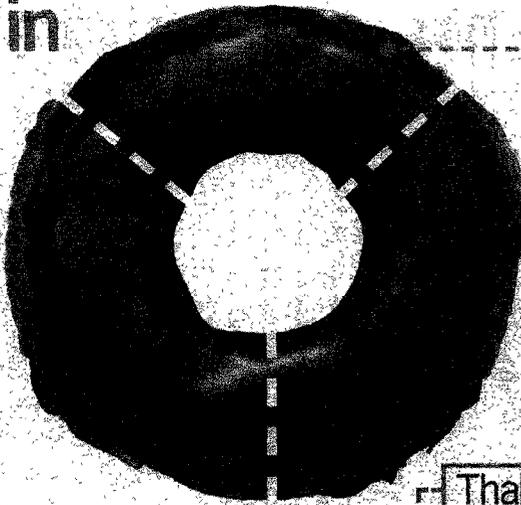


# TESTING TESTING!

## Hidden calories in single servings

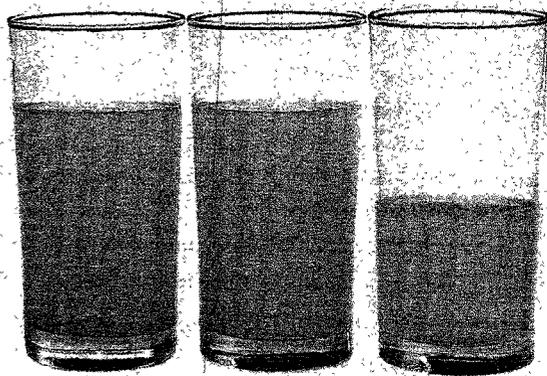
Looks like food for one—but don't be fooled

Some companies lower the calorie count on the label by listing two or more servings. The FDA warns against this practice, but we found plenty of brands that still play the fattening game.



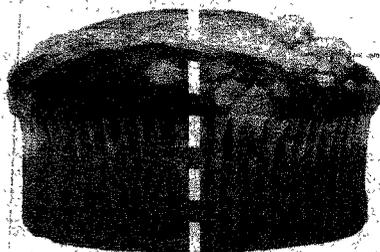
### Nutrilicious Donut

**THE LABEL** Three servings per donut; 120 calories per serving  
**REALITY** Who eats a third of a donut? This carb-coated variation is no bigger than an English muffin, so you'll probably eat the whole thing—for a total of 360 calories.



### Glacéau Vitamin Water

**THE LABEL** Two and a half servings per container; 50 calories per serving  
**REALITY** The calorie total for this 20-ounce bottle of sweetened, fortified water is 125. But the company is having it both ways: They downplay the calories but emphasize the vitamins by listing those amounts per serving *and* per bottle.

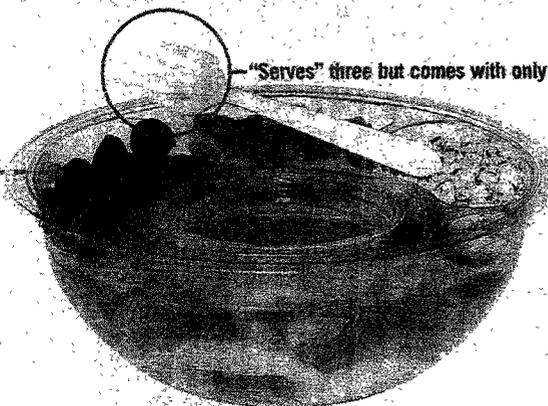


### Otis Spunkmeyer muffin

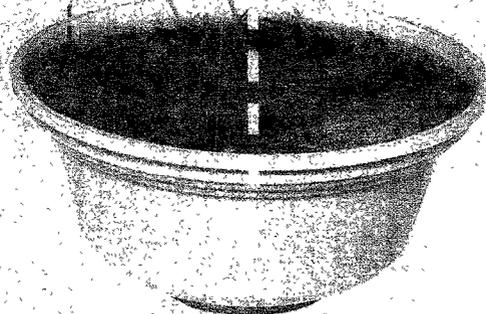
**THE LABEL** Six servings for a package of three Cheese Streusel muffins; 220 calories per serving  
**REALITY** If you do the math, you'll see that each muffin packs 440 calories.

### Bistro to Go Greek Salad

**THE LABEL** About three servings per container; 140 calories per serving  
**REALITY** This salad is awfully small to share. It packs about 420 calories. Eat it all but skip half the dressing.



"Serves" three but comes with only one fork



### Thai Kitchen noodles

**THE LABEL** Two servings per container of rice noodles; 120 calories per serving  
**REALITY** The package contains 240 calories and a whopping 1,380 mg of sodium.

PHOTOGRAPHS, TOP TO BOTTOM: HALSEY CREATIVE SERVICES/STOCKFOOD AMERICA; DAVID LEWIS TAYLOR (4)