



THE ASSOCIATION FOR

**DRESSINGS** 2617 5 JUL 20 P1:56  
& SAUCES

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July 18, 2005

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

RE: Docket No. ~~2004N-0463~~ Food Labeling; Prominence of calories; 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 portion sizes (70 FR 17008 & 17010; April 4, 2005)

Dear Sir or Madam:

The Association for Dressings and Sauces (ADS) is the international trade association representing manufacturers of salad dressings, mayonnaise and condiment sauces and the suppliers to the industry. ADS submits the following comments on the dockets referenced above.

FDA has raised some very thoughtful questions regarding serving size and prominence of calories in these Advance Notice of Proposed Rulemakings (ANPRMs). The Agency should be applauded for its efforts to address the issue of obesity and to provide consumers with additional tools to make informed food decisions. However, the food label is but one tool consumers use when making such choices, and consumers alone make the decisions on what and how much to consume, coupled with the level of physical activity in which they choose to engage. These facts are key as the Agency considers any food labeling changes and whether any changes will meaningfully affect consumer behaviors. Current labeling requirements provide the necessary information to allow consumers to make healthy food choices, if they desire.

Additional comments follow:

**More Consumer Research Is Needed**

Any changes to nutrition labeling of calories or serving size must be based on sound consumer research that support such changes. Currently, there is inadequate consumer research information available to indicate that any proposed label change will help consumers make better food choices toward achieving a healthy lifestyle. Toward that end, ADS urges FDA to conduct focused consumer research using meaningful label change options to determine if such changes serve as a catalyst to affect consumer behavior with a goal of achieving positive dietary choices.

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**Label Change Options Should Be Voluntary**

In the absence of consumer data, options for labeling that fall outside of the scope of existing regulations should be voluntary. This flexibility is available to food companies under existing regulations, if they choose to provide additional information to consumers (e.g., dual calorie), if warranted.

**Avoid Sequential Label Change Revisions**

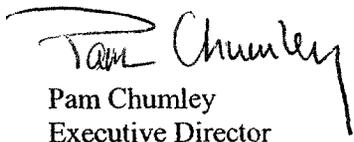
The dressing and sauce industry is diligent in complying with current nutrition labeling regulations and future requirements (e.g., the requirement to add *trans* fat to the label), when known. In turn, the Agency should give careful thought to any future label change requirements and ensure all changes are proposed at one time to avoid confusion to consumers and unnecessary expense to manufacturers.

**Calories from Fat**

In the "Prominence of Calories" ANPRM, the Agency seeks comments on specific questions related to calories from fat on the Nutrition Facts panel. The Association for Dressings and Sauces believes that the calories from fat declaration should not be required in nutrition labeling as this places an inappropriate focus on calories from fat rather than overall calories. The Agency itself recognized this in early 2004 when it unveiled its new strategy to help reduce obesity that touted its new "calories count" approach. As the press release announcing the strategy notes, "...there is no substitute for the simple formula that 'calories in must equal calories out' in order to control weight." The absence of caloric type (e.g., calories from fat or calories from carbohydrates) is telling.

We appreciate your consideration of these comments.

Sincerely,



Pam Chumley  
Executive Director