

June 7, 2005

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

RE: **Federal Register Notice**, Volume 70, No. 67, April 8, 2005

Docket No. 2005N-0120

Food and Drug Administration, HHS: Proposed Collection; Comment Request;
Experimental Study of Carbohydrate Content Claims on Food Labels

Thank you for the opportunity to comment on the proposed study concerning the public perception of carbohydrate claims. As four separate organizations with similar overarching missions, the Grain Foods Foundation, Wheat Foods Council, American Bakers Association and North American Millers' Association, are together submitting comments. Between the four organizations, we represent the majority of U.S. grain producers, millers, bakers and allied trades in the baking and milling industry.

Our concern is if FDA agrees to authorize carbohydrate labeling, it will set a precedent for any other unsubstantiated whim of the consumer or the food industry in the future. In addition, this action, from an authoritative body such as FDA, would add credibility to the false belief that carbohydrates are to be avoided. While the terms "low-carbohydrate" and "high-carbohydrate" are both perceived as *good* or *bad* by various segments of the public, whatever definition you might decide upon will be meaningless to a high percentage of the population at best.

Therefore, we believe Health Canada made a wise decision when they disallowed all carbohydrate claims as there are no scientific health reasons for doing so. By not allowing any claims, they made the playing field fair for all manufacturers and at the same time, delivered a strong statement to the consumer. We urge FDA to follow suit.

However, since you are conducting a study to ascertain the consumers' opinion of foods with the claims, we would like to have input:

- 1) The methodology for the study appears sound with the number of households expected to participate and the fact that **most** segments of the population are included. (While those on low incomes may not have computer access, most consumers who are on low-carbohydrate diets, have incomes over \$75,000. Opinion Dynamics Corp. March 2005 survey.)
- 2) We question the foods chosen for the study. We agree with the selection of bread, but please consider pasta, cereal, orange juice or any fruit over soda and an entrée.
- 3) Might you consider using both white bread and whole grain bread, as the response will surely be different?

A Harris Interactive survey commissioned by the Grain Foods Foundation in May, 2005, interviewed a nationwide sample of 2,185 U.S. adults (18+). Data were weighted to be representative of the total U.S. adult population on the basis of region, age within gender, education, household income, race/ethnicity, and propensity to be online. (Results are 95 percent certainty with a sample error of plus or minus 3 percentage points). This online sample was not a probability sample.

Key Findings Regarding The Phrase “Low Carb:”

1) Half (50%) of adult Americans think a food with the words “low carb” on the label is “a diet food”.

- This is more likely the thought among younger adults. Fifty-six percent of those aged 18-34 report that this is what they think of a food product with the words “low carb” on the label, compared to 47% of those aged 35 and older.

2) Thirty-six percent of adult Americans think the food is “less tasty than a similar product that doesn’t say ‘low carb’” when seeing these words on the food label.

- This is less likely the thought among older adults (those aged 55 and older). Forty percent of those aged 18-34, 44% of those aged 35-44 and 36% of those aged 45-54 think this when seeing the words “low carb” on a food label, compared to 26% of those aged 55 and older.
- Those living with children (42%) are more likely than those without children in the household (33%) to think this.

4) About one-third (32%) claim that they think a food is “healthier than a similar product that doesn’t say ‘low carb’ when they see these words on the food label.

- A *lower* proportion of those with at least a 4-year degree (25%) think this when seeing the words “low carb” on a food label than those with some college experience or less (31% of those with some college experience but no 4-year degree and 36% of those with no college experience at all).
- 13% think the food is “no different than foods without these words on the label”
- 2% think the food is “more tasty than a similar product that doesn’t say “low carb”
- 13% claim that none of these thoughts come to mind when they see the words “low carb” on a food label.

Based on this one study, when 50 percent of adults think “low carb” means a diet food and 32 percent think it is healthier than a product that doesn’t say “low-carb,” labeling for carbohydrates obviously appears to be a disservice to the consumer.

Thank you for consideration of our views. If you have questions regarding the studies quoted here, please do not hesitate to contact us.

Sincerely,



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