



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

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

**RE: Docket Nos. 2005N-0120; Agency Information Collection Activities;
Proposed Collection; Comment Request; Experimental Study of
Carbohydrate Content Claims on Food Labels**

June 7, 2005

The Grocery Manufacturers of America (GMA) appreciates this opportunity to offer comments concerning the Food and Drug Administration's (FDA) proposed collection of information on the experimental study of carbohydrate content claims on food labels.

General Comments

GMA supports the FDA's efforts to conduct experimental studies on nutrient content claims. Our understanding of the purpose of the data collection is to gather information to improve the agency's knowledge of how consumers understand carbohydrate content claims. GMA encourages the agency to share their findings from the experimental study once completed.

Specific Comments on the Research Questions

GMA favors a survey that asks relatively straight forward questions that are specific to consumer understanding of the claims; however, GMA's concern with the carbohydrate claims research is that FDA is potentially asking questions beyond consumer understanding of the factual information. Of specific concern are questions #2 and #3 which ask whether consumers perceive products with certain claims to be "healthier" or "more desirable" than other products. We recommend that FDA ask questions about whether consumers appropriately understand factual information communicated by the carbohydrate claims.

Specific Comments on the Label Claims Disclosure Statements

When disclosure statements are tested in the experimental study of carbohydrate content claims, GMA agrees with the use of the disclosure statement, "see nutrition information

for fat content,” only when the product requires the disclosure statement. Products require disclosure statements for fat when:

1. The product exceeds 13.0 grams of fat per reference amount customarily consumed, per labeled serving, or, for foods with small serving sizes, per 50 grams (CFR 101.13(h)(1)).
2. A meal contains (per labeled serving) more than 26 g of fat (21 CFR 101.13(h)(2)).
3. A main dish contains (per labeled serving) more than 19.5 g of fat (21 CFR 101.13(h)(3)).

GMA disagrees with the second disclosure statement, “see nutrition information for sugar content,” because sugar is part of the total carbohydrate value. In addition, there is no Daily Value for sugar for which a threshold quantity can be based (as there is with sodium).

GMA generally agrees with the third disclosure statement, “not a low calorie food,” although we believe a better approach would be to test the carbohydrate content claim directly accompanied by a prominent declaration either of the calories per serving (as declared in the Nutrition Facts box), or of a prominent statement that refers to the Nutrition Facts box for calorie information, or of a prominent statement that otherwise refers to the importance of calories. GMA and its members learned from the strong interest in “low fat” products that many consumers only looked at the grams of fat and neglected to look at the calorie information. This would reinforce the importance of calories.

Specific Comments on the Definition of the Carbohydrate Content Claims

GMA would encourage the Agency to openly communicate the specific criteria for the label claims prior to the study and allow for stakeholder comments. The definition of the carbohydrate content claims should be made available for “carb-free,” “low carb,” “x g net carbs,” “carbconscious,” “good source of carb,” and “excellent source of carb.”

GMA thanks the agency for this opportunity to comment on the experimental study of carbohydrate content claims.

Sincerely yours,

A handwritten signature in black ink that reads "Alison J. Kretser". The signature is written in a cursive style with a long, sweeping underline.

Alison J. Kretser
Senior Director, Scientific and Nutrition Policy