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March 3, 2006

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

Re: Docket No. 2005P-0325; Citizen Petition re Nutrition Labeling re Sugar and Other Sweeteners

This letter is written in support of a petition submitted to the FDA by the Sugar Association requesting amendment of its regulations related to sugar and alternative sweeteners. As nutrition faculty at Chandler-Gilbert Community College in Chandler, Arizona, I teach college nutrition classes for both health care majors and personal improvement for a student enrollment of approximately 100-150 per semester. The action items requested by the Sugar Association accurately reflect the issues that come up regularly in the classroom.

As part of the curriculum, we spend a considerable amount of time on reading food labels, especially the Nutrition Facts Panel (NFP). Students are always confused when it comes to the "sugar" category. They immediately associate "sugar" to mean white table sugar, sucrose. We know that's not what is in so many of our manufactured food and beverage products. In class, we review the many sources of sugar but point out that they will not see this clearly on the label. The responsibility of fully analyzing the list of ingredients to truly understand the simple sugar content of a food product falls on the consumer who may have little knowledge of these terms if they are not in my class.

Recently, the popularity of the high protein/low carbohydrate fad diet resulted in a proliferation of "low sugar" or "less sugar" or "no added sugar" food products. My students are very confused by this misleading labeling. Manufactured foods that are lower in sugars are often higher in fats. We know that this increase in hydrogenated fats, leading to increased trans fatty acids, have a multiple impact on blood lipid levels and its related risk for development of chronic diseases that dietary sugar does not have.

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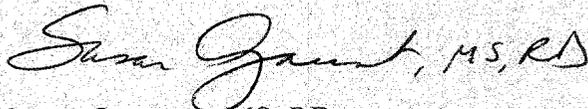
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Because of increased research, fat labeling has been expanded to include not only total fat and saturated fat, but now includes trans fats. The same process should be followed to better identify sources of sugars. I agree with the Sugar Association's suggested Nutrition Facts Panel that itemizes "Sugars/Syrups" to more correctly identify the ingredients in that food/beverage. In addition, labeling sugar alcohols as "Polyols" and listing its content will assist the educational process of the American public. A few years ago, consumers were not familiar with the term trans fats, but that has become a relatively common term today. Artificial sweeteners are a common food additive, but few consumers know the many types of artificial sweeteners available and what is a reasonable, healthy intake.

Every day I am made aware of the lack of knowledge and increasing confusion as it relates to the typical American consumer's understanding of packaged, processed foods. In the classroom, I assure students that our government has as a priority our best interests. It is through efforts such as this proposal by the Sugar Association for enhanced food labeling information that the American public can be confident in their ability to make educated decisions on food choices. As an educator of future health care professionals, I recommend the adoption of the labeling changes recommended by the Sugar Association. Thank you for your consideration.

Sincerely,



Susan Gaumont, MS, RD
Nutrition Faculty