



FEB 15 2002

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Richard Keelor, Ph.D.

President

1101 15th Street, NW Suite 600
Washington, D.C. 20005

Dear Dr. Keelor:

This is in response to your letter of August 14, 2001, regarding percentage ingredient labeling.

We regret the delay in responding.

In your letter you expressed opposition to the petition (97P-0130) submitted by the Center for Science in the Public Interest that requested FDA to expand requirements for percentage ingredient labeling. Specifically you expressed the belief that the current label is adequate in providing information about the proportion of ingredients and nutritional information.

We thank you for your interest in this matter. We will forward a copy of your letter to our Dockets Management Branch to be included with other letters responding to this petition. We will consider all comments before making a final decision.

Sincerely yours,

Loretta A. Carey
Consumer Safety Officer
Division of Standards
and Dietary Supplements
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition

97P-0130

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August 14, 2001

Mr. Joseph A. Levitt
Director
Center for Food Safety and Applied Nutrition
Food and Drug Administration
Room 6815
200 C Street, SW
Washington, DC 20204

**Re: Docket No. 97P0130
Percentage Ingredient Labeling**

Dear Mr. Levitt:

The Sugar Association is a trade organization representing the nation's sugar cane growers and refiners and sugar beet growers and processors. Our primary mission is to inform and educate the consuming public about the role of sugar (sucrose) in nutrition and health. We sponsor scientific research and conduct information and public education programs. Based on the totality of evidence from the scientific community around the world, we support and promote the idea that sugar in moderation is a safe and useful part of a balanced diet.

The Sugar Association has supported and promoted federal nutrition policies such as the Nutrition Labeling and Education Act and the Dietary Guidelines for Americans through the educational programs and materials it sponsors on its own and with other organizations. Examples include "Label Power," a nutrition label education program developed with USDA and the Food and Drug Administration, and "Physical Activity and Nutrition," an educational package developed with the President's Council on Physical Fitness and Sports and distributed through the Consumer Information Council.

The Sugar Association supported mandatory nutrition labeling of foods that include sugars and believes that food label information can play an important role in helping Americans choose healthful diets when that information is properly conveyed and understood by consumers.

However, we strongly believe that the petition brought by the Center for Science in the Public Interest to expand requirements for percentage ingredient labeling will not further that end. FDA has a critical responsibility to assure that food labels provide sound, truthful information. However, consumers already are bombarded with nutrition

THE SUGAR ASSOCIATION, INC.



messages from so many sources, that the food label should be reserved for the most valuable and necessary information on a food's nutrition profile.

The ingredient statement currently on food labels is a valuable tool for consumers. Listed in order of predominance by weight as required by FDA, the ingredient statement allows consumers to identify the proportion of ingredients in a food product. Focusing on the numerical percent of any one ingredient would be a disservice to consumers who might then focus on the percent of that ingredient rather than the nutrient profile of the whole food and how it fits into their overall diet. The percentage of a healthy ingredient contained in a package is just one part of the food's overall nutrition profile, which is already available to consumers through the Nutrition Facts panel.

Additionally, such a labeling scheme raises inherent problems for certain ingredients and certain products. For example, in a bread or other yeast raised product, would the percent of sugar listed be the recipe amount or that remaining in the bread after the leavening and baking process is complete? More importantly, would either number provide a consumer with valuable information? Again, the current regulations assure that the Nutrition Facts panel and the ingredient declaration contain the most valuable information needed for consumers to make wise personal choices about the foods they eat.

In the ensuing years since the enactment of the NLEA, American consumers have grown to trust the current food label. It provides them the valuable information they need. As importantly, it is not cluttered with additional information of lesser importance for determining a product's nutrient profile. The current label is entirely adequate and should not be altered to include further percentage ingredient listing.

Thank you for the opportunity to share our thoughts on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Keelor". The signature is fluid and cursive, with a large initial "R" and "K".

Richard Keelor, Ph.D.
President

c: Chairman, Board of Directors