



November 21, 2025

Edwin O. Rogers
Chief Executive Officer
Bonumose, Inc.
1500 State Farm Blvd.
Charlottesville, VA 22911

Dear Mr. Rogers:

FDA is committed to transparency and is actively working towards a regulatory system to address the labeling of sugars metabolized differently than traditional sugars more broadly. FDA also (1) confirms that D-tagatose is an eligible noncariogenic sweetener for the noncariogenic carbohydrate sweeteners and dental caries health claim authorized by our regulations at 21 CFR 101.80, (2) acknowledges the different effect D-tagatose has on glycemic response in certain studies, and (3) recognizes D-tagatose's caloric value of 1.5 calories per gram (kcal/g). Therefore, while FDA considers how to address food labeling for sugars metabolized differently than traditional sugars more broadly, we intend to exercise enforcement discretion with respect to the exclusion of D-tagatose from the declarations of "Added Sugars" and "Total Sugars" on the Nutrition Facts label and use of 1.5 kcal/g for D-tagatose when determining the calories in a product containing D-tagatose.

Sincerely,

Kyle Diamantas, J.D.
Deputy Commissioner for Human Foods
Human Foods Program