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

Re: Docket No. 2001N-0548; Food Labeling; Guidelines for Voluntary Nutrition Labeling of Raw Fruits, Vegetables, and Fish; Identification of the 20 Most Frequently Consumed Raw Fruits, Vegetables, and Fish; Reopening of Comment Period FR70. 16995

The American Frozen Food Institute (AFFI or the Institute) is the national trade association representing frozen food processors, suppliers and marketers. AFFI's more than 520 member companies account for over 90 percent of the frozen food production in the United States, valued at approximately \$60 billion. AFFI members are located throughout the country and are engaged in the manufacture, processing, transportation, distribution, and sale of products nationwide.

AFFI, which represents almost all frozen fruit and vegetable processors, has supported the Food and Drug Administration's (FDA's) food labeling efforts as a means of achieving the ultimate goal of the Nutrition Labeling and Education Act (NLEA) – to provide accurate and useful nutrition information to consumers regarding the foods they select. We support the agency's current review of its voluntary nutrition labeling in-store program and believe this review presents an important opportunity to revisit the accuracy and value of current nutrient values provided to consumers on raw fruits and vegetables.

Historically, a fundamental concern is the out-dated nutrient values that are incorporated into the current voluntary program. In-store nutrition information on raw produce provides an important basis from which consumers should be able to make reasonable judgments about the nutrient values of various foods available for purchase at a retail store. Making reliable nutrition comparisons between a raw and a frozen fruit or vegetable has been impossible given the flaws found in the antiquated data incorporated into the voluntary in-store program for raw produce.

The raw fruit and vegetable industry has failed to provide up-to-date nutrient values that reflect the actual nutrient contribution of raw products. Nutrient inaccuracies have flourished for years to the consumer's detriment. The data provided by the U.S. Department of Agriculture (USDA) subsequent to the close of the original June 3, 2002, comment period begins to address some of the most egregious examples of inaccurate nutrient values, and significantly tracks with those values established through AFFI's nutrient database.

For example, previously held Vitamin A values are more consistent with AFFI's database. USDA data shows a 110 percent daily value (DV) for Vitamin A in carrots versus the previously held 270 percent DV. AFFI's database of 31 Vitamin A composite samples of 12 retail packages concluded that Vitamin A in carrots was 60 percent of the DV. Similarly, the previous held Vitamin A value of 15 percent of DV in broccoli would be lowered to 6 percent. This is much closer to the 2 percent Vitamin A value established through AFFI's database.

The attached table (Table I) compares FDA's current proposed, AFFI's and FDA's 2002 values for strawberries, broccoli, carrots, celery, onions and potatoes. FDA's proposed data tracks closely to those nutrient values established through AFFI's database. This is especially true for carbohydrate values (with the exception of broccoli), fiber, sugars, protein, calories and iron (with the exception of onions). This relationship reconfirms the benefit of a well conceived and implemented database.

AFFI supports the changes proposed by the agency. The Institute believes the proposed nutrient values are further evidence that there is a significant relationship between frozen and raw fruit and vegetable nutrient values. NLEA established that frozen fruit and vegetable processors validate, and the industry has completed validation, of the information that is included on frozen fruit and vegetable labels. The consumer should continue to expect the same valid information in the produce aisle at the supermarket.

Clearly the close relationship between FDA's proposed and AFFI's nutrient values should dictate the need to revise and update all nutrient values for raw vegetables and fruits. AFFI believes FDA has begun to close the information gap and ensure that the raw produce industry provides consumers with accurate, statistically validated nutritional values for the raw fruits and vegetables they purchase. The value of the voluntary program is undermined when consumers do not receive reliable, accurate nutrient information.

AFFI would welcome the opportunity to discuss this issue further with the agency.

Sincerely,

Leslie G. Sarasin, CAE
President and
Chief Executive Office

Table I - Comparison of Fruit and Vegetable Nutrients

Fruit or Vegetable	FDA Proposal	AFFI Database	2002 FDA Value
Strawberry (147 g)			
Total Carbohydrate	11g	13g	12g
Dietary fiber	2g	1g	4g
Sugars	6g	8g	8g
Calcium	0%	0%	2%
Iron	0%	0%	4%
Broccoli (148g)			
Sodium	80mg	35mg	55mg
Total Carbohydrate	10g	6g	8g
Dietary fiber	3g	3g	5g
Sugars	2g	3g	3g
Protein	2g	3g	5g
Vitamin A	6%	2%	15%
Iron	4%	4%	6%
Carrot (78g)			
Calories	30	35	35
Sodium	60mg	55mg	40mg
Total Carbohydrate	7g	6g	8g
Vitamin A	110%	60%	270%
Celery ((110g)			
Calories	15	20	20
Sodium	115mg	120mg	100mg
Total Carbohydrate	4g	4g	5g
Dietary fiber	1g	1g	2g
Sugars	2g	2g	1g
Protein	0g	0g	1g
Vitamin A	10%	0%	2%
Onion (148g)			
Calories	45	50	60
Total Carbohydrate	11g	11g	14g
Protein	1g	<1g	2g
Calcium	2%	0%	4%
Iron	4%	0%	2%
Potato (148g)			
Calories	110	100	40
Sodium	0mg	30mg	10mg
Total carbohydrate	26g	23g	7g
Dietary fiber	2g	<1g	4g
Sugars	1g	0g	2g
Vitamin C	45%	0%	40%
Iron	6%	4%	8%

