



Produce Marketing Association

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June 17, 2005

To: www.fda.gov/dockets/ecomments
Re: Docket No. 2004N-0456

The Produce Marketing Association (PMA) is pleased to submit these comments on the Food and Drug Administration's advance notice of proposed rulemaking "Food Labeling: Serving Sizes of Products That Can Reasonably Be Consumed at One Eating Occasion; Updating of Reference Amounts Customarily Consumed; Approaches for Recommending Smaller Portion Sizes."

PMA is the largest global not-for-profit trade association representing companies that market fresh fruits and vegetables. We represent companies throughout the food distribution chain that market more than 90% of fresh produce sold at the consumer level. We are funded primarily by members' dues, revenues from exhibits, product sales, and meeting registrations.

Like the U.S. government and other health authorities, PMA recommends that consumers eat five or more servings of fruits and vegetables each day. Fresh produce plays an important role in efforts to improve the public's health by offering flavorful, nutritious, and convenient products that will help stem the obesity epidemic.

Consumers, however, are confused about what a "serving" is, and government information about serving sizes differs. PMA believes that accurate, understandable information about serving sizes will help eliminate that confusion and encourage Americans to make appropriate, healthful choices about their diets. FDA is seeking information about "serving size" as it relates to the Nutrition Facts Panel that appears on or near foods. The fresh fruit and vegetable industry is subject to a voluntary nutrition labeling program under FDA and does make use of the Nutrition Facts Panel to inform consumers about the nutrition profiles of the 20 most frequently consumed fruits and 20 most frequently consumed vegetables (listed in the table below, Appendix A).

For purposes of implementing provisions in the Nutrition Labeling and Education Act of 1990 (NLEA) (Public Law 101-535), FDA has defined "serving" or "serving size" to mean: "the amount of food customarily consumed per eating occasion by persons 4 years of age or older, which is expressed in a common household measure that is appropriate to the food."

In addition, The Dietary Guidelines for Americans is published jointly every five years by the Department of Health and Human Services (HHS), of which FDA is a key agency, and the U.S. Department of Agriculture (USDA). The guidelines provide authoritative advice for people two years and older about how good dietary habits can promote health and reduce risk for major chronic diseases. The 2005 edition of the guidelines was released January 12, 2005.

In this most recent edition of the Dietary Guidelines for Americans, serving size for fruits and vegetables is not defined as “the amount of food customarily consumed per eating occasion.” Rather it is defined as one-half cup: Fruits and Vegetables: Four and one-half cups (nine servings) of fruits and vegetables are recommended daily for the reference 2,000-calorie level, with higher or lower amounts depending on the caloric level. This results in a range of 2½ to 6½ cups (5 to 13 servings) of fruits and vegetables each day for the 1,200- to 3,200-calorie levels.

PMA conducted consumer research in early 2005 in part to determine consumers’ understanding of the word “serving” as it relates to fresh fruits and vegetables (the executive summary and topline results are included with these comments in Appendix B). Ironically, eight out of 10 consumers think they have a clear understanding of what is meant by a serving of fruits and vegetables, but a series of follow-up questions in the survey suggested otherwise. For example, when asked to express in their own words what a “serving” is, responses were all over the map: from one cup, to a handful, to a one-half cup, to a scoopful.

In addition, PMA’s research found that consumers better understand recommended amounts of food when they are expressed in “cups” rather than “servings.” (More detail is available in Appendix B).

PMA is concerned that these various definitions of the same word, “serving,” only confuse consumers. We ask that the agency find a way to reduce that confusion through information provided about serving sizes on the Nutrition Facts Panel. Any solution would have to meet the agency’s regulatory and statutory obligations and would have to be tested with consumers to ensure that the solution does not exacerbate the current confusion.

One suggestion would be to list the serving size as it is now on the Nutrition Facts Panel and underneath that (or in close proximity) indicate the equivalent number of servings it would provide based on the Dietary Guidelines. No other changes in the label would be needed. For example:

Celery

Serving Size 2 medium stalks (110g)

This amount provides about 1 cup or 2 of your recommended daily servings of vegetables

Orange

Serving Size 1 medium (154g)

This amount provides about 1 cup or 2 of your recommended daily servings of fruit

FDA’s experience and consumer research will likely find a better solution, and PMA highly recommends that the agency find a way to equate the NLEA serving sizes provided on the Nutrition Facts Panel with the serving information provided in the Dietary Guidelines. When it comes to nutrition information, consumers face a great deal of confusion in the marketplace. PMA and its members would like to see consumers eating the amounts of fruits and vegetables recommended in guidelines for the health of our nation and the health of our industry. Fruits and vegetables are the power players in the fight against obesity and many chronic illnesses. To make informed choices, consumers must have straightforward, non-confusing information available to them.

Because of the way regulations evolve, we are now faced with multiple meanings for the same word: serving.

PMA members in the service wholesale and retail sectors are key players in the nutrition labeling initiative to inform consumers at point of sale. We appreciate the flexibility of this voluntary regulatory program, and we are proud that our members consistently meet the compliance threshold set by FDA. In addition, our members who supply fresh fruits and vegetables to retail outlets often use the Nutrition Facts boxes on their products and packaging to highlight the positive nutrition contributions their products make. We appreciate the agency's efforts to improve and enhance the nutrition information provided to consumers through agency-regulated programs such as this.

PMA appreciates the opportunity to present these comments. We commend the agency for its thorough review of this and other food issues. Please do not hesitate to call upon us if we can be of further assistance. We look forward to working with you.

Kathy Means, CAE
Vice President of Government Relations
Produce Marketing Association

Appendix A

Top 20 Most Frequently Consumed Fruits	FDA's Current (Proposed) Nutrition Facts Serving Weight	FDA's Current (Proposed) Nutrition Facts Household Measure	USDA Database 1-Cup Equivalents	# of Cups in the Nutrition Facts serving	Number of Dietary Guidelines "servings" in one Nutrition Facts "serving"
Apple	154 g	1 medium	1 cup quartered (125 g)	1.23	2.5
Avocado	30 g	1/5 medium	1 cup sliced (146 g)	0.21	0.5
Banana	126 g	1 medium	1 cup sliced (150 g)	0.84	1.75
Cantaloupe	134 g	1/4 medium	1 cup diced (156 g)	0.86	1.75
Grapefruit	154 g	1/2 medium	1 cup sections & juice (230 g)	0.67	1.33
Grapes	126 g	3/4 cup	1 cup, seedless (160 g)	0.79	1.5
Honeydew					
Melon	134 g	1/10 medium	1 cup diced (170 g)	0.79	1.5
Kiwifruit	148 g	2 medium	N/A	1.00	2
Lemon	58 g	1 medium	1 cup sections (212 g)	0.27	0.5
Lime	67 g	1 medium	N/A	0.32	0.66
Nectarine	140 g	1 medium	1 cup slices (138 g)	1.00	2
Orange	154 g	1 medium	1 cup sections (165 g)	0.93	1.75
Peach	147 g	1 medium	1 cup slices (170 g)	0.86	1.75
Pear	166 g	1 medium	1 cup slices (138 g)	1.20	2.5
Pineapple	112 g	2 slices (3" diameter, 3/4" thick)	1 cup diced (155 g)	0.72	1.5
Plums	151 g	2 medium	1 cup sliced (165 g)	0.92	1.75
Strawberries	147 g	8 medium	1 cup whole (144 g)	1.02	2
Sweet Cherries	140 g	1 cup (21 cherries)	1 cup without pits (145 g)	0.97	2

Tangerine	109 g	1 medium	1 cup sections (195 g)	0.56	1
Watermelon	280 g	1/18 medium, 2 cups diced pieces	1 cup diced (152 g)	1.84	3.66

Top 20 Most Frequently Consumed Vegetables	Current (Proposed) Nutrition Facts Serving Weight	Current (Proposed) Nutrition Facts Household Measure	USDA Database 1- Cup Equivalents	# of Cups in the Nutrition Facts serving	Number of Dietary Guidelines "servings" in one Nutrition Facts "serving"
Asparagus	93 g	5 spears	1 cup (134 g)	0.7	1.5
Bell pepper	148 g	1 medium pepper	1 cup chopped (149 g)	1	2
Broccoli	148 g	1 medium stalk	1 cup chopped (88 g)	1.68	3.33
Carrot	78 g	1 carrot, 7" long, 1 1/4" diameter	1 cup chopped (128 g)	0.61	1.25
Cauliflower	99 g	1/6 medium head	1 cup (100 g)	1	2
Celery	110 g	2 medium stalks	1 cup chopped (101 g)	1.09	2
Cucumber	99 g	1/3 medium cucumber	1 cup sliced (104 g)	0.95	2
Green (snap) beans	83 g	3/4 cup, cut	1 cup (110 g)	0.75	1.5
Green cabbage	84 g	1/12 medium head	1 cup chopped (89 g)	0.94	1.75
Green onion	25 g	1/4 cup chopped green onion	1 cup chopped (100 g)	0.25	0.5
Iceberg lettuce	89 g	1/6 of a medium head	1 cup shredded (72 g)	1.24	1.25
Leaf lettuce	85 g	1 1/2 c shredded leaf lettuce	1 cup shredded (36 g)	2.36	2.33
Mushroom	84 g	5 medium	1 cup pieces/slices (70 g)	1.2	2.5
Onion	148 g	1 medium whole onion	1 cup chopped (160 g)	0.93	1.75
Potato	148 g	1 medium	1 cup diced (75 g)	1.97	4
Radish	85 g	7 radishes	1 cup sliced (116 g)	0.73	1.5
Summer squash	98 g	1/2 medium	1 cup sliced (113 g)	0.87	1.75
Sweet corn*	90 g	kernels from 1 medium ear	1 cup (154 g)	0.58	1

Sweet potato	130 gram	1 medium, 5" long, 2" diameter	1 cup cubed (133 g)	0.98	2
Tomato	148 g	1 medium tomato	1 cup chopped or sliced (180 g)	0.82	1.66

Appendix B



February 11, 2005

MEMORANDUM

TO: The Produce Marketing Association

FR: Ernest Paicopolos, Principal
Opinion Dynamics Corporation

RE: Analysis of Recent Omnibus Data

This memo will provide a summary analysis of the results from a national telephone survey conducted among 1,000 consumers. The survey was conducted between February 8 and 9, 2005. When looking at results from the overall sample, the reader should keep in mind that the margin of error is approximately $\pm 3.00\%$ at the mid-range of the 95% confidence interval. That is, when conducting 100 such surveys, 95 of them will yield results that fall—*at worst*—3 points on either side of a given percentage.

Executive Summary

The results from this survey indicate that consumers are more likely to actually eat fruits and vegetables at the FDA's suggested levels when the amounts are expressed as "cups" rather than "servings".

To begin, we found that just under 4 in 10 consumers (38%) are even aware of the fruit and vegetable components of the FDA's dietary guidelines—60% say they are not. Ironically, a huge majority (81%) *think* they have a "clear understanding" of what is meant by a "serving" of fruits and vegetables, but a series of follow-up questions suggests otherwise.

For example, when asked to express in their own words what a "serving" is, responses were all over the map: from one cup, to a handful, to a half a cup, to a "scoopful". Moreover, we found

that 81% also agreed that it is easier to understand an amount of fruits and vegetables when it's described as "cups" rather than "servings"—only 13% disagreed to any extent with this view.

The ultimate test of understanding came on two questions which pitted the current FDA recommendation of "5-13 servings a day" against the same amount expressed as "2 1/2 to 6 1/2 cups a day". The results show that 43% of consumers think the "cup" wording is about the right amount that they could reasonably eat, while only 26% expressed the same view about the "serving" wording—even though they represent the same actual amounts of fruits and vegetables. On the flip side, we found that 43% of consumers thought the "serving" wording was "much more" than they could reasonably eat in one day; conversely, only 28% felt the same way about the "cup" wording. Clearly, the "cup" wording would dramatically increase the chances of consumers actually eating the recommended FDA servings of fruits and vegetables.

What follows is a question-by-question display of the survey results.

TOPLINE

1,000 NATIONAL CONSUMERS (± 3%) February 2005

1. As you may know, the Food and Drug Administration, or FDA, recently released new dietary guidelines. The new guidelines recommend that consumption of fruits and vegetables be increased from the old level of 5-9 servings a day to the new level of 5-13 servings a day. Had you seen, heard, or read anything about this specific recommendation for fruits and vegetables?

Yes	38%
No	60
(Not sure)	2

2. In general, do you feel you have a clear understanding of what is meant by a "serving" of fruits and vegetables?

Yes	81%
No	17
(Not sure)	2

3. Please describe for me, in your own words, what a "serving" of fruits and vegetables would be.

Less than a cup, less than one cup	18%
One piece	17
One cup	16
A piece of fruit & up to a cup of vegetables	5
Less than 6 oz's	5
Handful/fistful	4
More than one piece	3
6 oz's or more	3
A portion (general)	2
Depends on the person/size/nutritional value	2
More than one cup	2
Other	4
(Don't know)	16
(Refused)	2

4. Some people have said that it's easier to understand an amount of fruits and vegetables when it's described in "cups" rather than as "servings". Would you strongly agree with this view, somewhat agree, somewhat disagree, or strongly disagree.

Strongly agree	53%
Somewhat agree	28
Somewhat disagree	7
Strongly disagree	6
(Don't know)	6

5. When you hear the FDA's recommendation for "5-13 servings of fruits and vegetables a day", do you consider that to be much more than you can reasonably eat, somewhat more, or about the right amount?

Much more	43%
Somewhat more	26
About the right amount	26
(Don't know)	4

6. What if the FDA's recommendation was for "2 1/2 cups to 6 1/2 cups of fruits and vegetables a day", would you consider that to be much more than you can reasonably eat, somewhat more, or about the right amount?

Much more	28%
Somewhat more	25
About the right amount	43
(Don't know)	4