

Division of Dockets Management
 Food and Drug Administration
 5630 Fishers Lane, rm. 1061
 Rockville, MD 20852
 Re: Docket No. 2004N-0456
 RIN number 0910-AF23

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May 2, 2005

To Whom It May Concern:

We at the U.S. Potato Board wanted to provide input and recommendations in response to FDA Docket No. 2004N-0456 for Food Labeling. While nutrition labeling on potatoes is voluntary under the Nutrition Labeling and Education Act of 1990, nutrition labeling on potatoes is important as potatoes are consumed frequently by American consumers and are among the 20 most frequently consumed raw vegetables (1,2).

The NFP commands a great deal of authority and respect in consumers' minds. Research conducted by the FDA revealed that consumers sometimes perceive the NFP as a recommendation for serving size and not simply a standard unit of measure. Therefore, consumers would benefit from a NFP that can quickly and easily inform them about a food's nutritional content. The U.S. Potato Board's own research of 1,100 adults discovered that, indeed, consumers look to the NFP for guidance as a credible and accurate tool for learning about nutrition (3).

The results from the U.S. Potato Board consumer poll about consumers' knowledge of the nutrients in potatoes was so compelling that the U.S. Potato Board launched a national, multi-tiered educational campaign to consumers, the media, and health educators. This ongoing campaign communicates the nutrient facts for potatoes and centers around the FDA Nutrition Facts Panel for fresh potatoes. To-date, advertising, public relations, and retail programs have reached more than 134 million consumers since launching in February, 2004.

The aforementioned campaign was undertaken by our industry, one that voluntarily participates in nutrition labeling, because we strongly support consumer nutrition education as a valuable and meaningful endeavor. We believe the current serving sizes listed on NFPs for potatoes are appropriate, easy for consumers to understand, and should therefore reflect the current serving size.

We support serving sizes that reflect a recommended portion size, rather than an arbitrary standardized unit of measure or amount customarily consumed. The current serving size for fresh potatoes of 1 potato (148g/5.3 oz) should remain the same since this amount:

1. Is the same serving size as several other raw vegetables typically consumed whole, including bell pepper, broccoli, onion, tomato (4)
2. Reflects a portion size suggested by the 2005 *MyPyramid* and that which is customarily consumed during an eating occasion (5)
3. Provides a reference amount that includes a common household measurement appropriate for potatoes



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However, the NFP could be improved for potatoes and assist consumers in making wise portion size choices by adding a term for "medium" (abbreviated as "med.") to the potato NFP. Our suggestion would change the serving size for potatoes to read:

Serving Size 1 med. potato (148g/5.3 oz)

This small edit to the current NFP would align the serving size with that suggested by *MyPyramid* (4). The 2005 *Pyramid* includes the following serving size for whole potatoes:

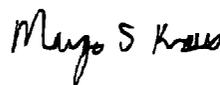
- 1 medium boiled or baked potato (2 1/2" to 3" diameter)

On behalf of the US Potato Board, we appreciate the opportunity to provide input on Food Labeling changes. We hope you find them useful as revisions are considered for the Nutrition Facts Panel.

Sincerely,



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References

1. Nutrition Labeling and Education Act of 1990 (the 1990 amendments). Pub L No. 101-535.
2. Pennington JAT *Documentation for the 1995 Nutrition Labeling Values for the 20 Most Frequently Consumed Raw Fruits, Vegetables, and Fish*. Washington, DC: Food and Drug Administration; Oct. 1995, revised June 1996.
3. eNation survey of 1000 U.S. adults, nationally representative of the population, from the online segment of Synonate's Consumer Opinion Panel. 2003.
4. Food labeling; nutrition labeling of raw fruits, vegetables, and fish; guidelines for voluntary nutrition labeling of raw fruits, vegetables and fish; identification of the 20 most frequently consumed raw fruits vegetables, and fish; final rule. *Federal Register*. August 16, 1996; 61:42742-42762.
5. Steps to a Healthier You. U.S. Department of Agriculture. www.MyPyramid.gov
- 6.



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