



Michael D. Maves, MD, MBA, Executive Vice President, CEO

November 9, 2007

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Food Labeling: Use of Symbols to Communicate Nutrition Information, Consideration of Consumer Studies and Nutritional Criteria; Public Hearing; Request for Comments [Docket No. 2007N-0277]

The American Medical Association (AMA) is pleased to offer comments to the Food and Drug Administration (FDA) regarding the use of symbols to communicate nutrition information on food labels. The FDA is to be commended for seeking to enhance consumer understanding of the nutritional value of foods through the use of more informative labels on food packages. Currently, a wide array of symbols are used by different food manufacturers, grocery stores, trade organizations, and health organizations to indicate the nutritional value of food using varying nutritional criteria. The AMA believes there is a need for clear, concise, and uniform labeling on food products and recommends front of label nutritional symbols similar to those developed by the Food Standards Agency (FSA) in the United Kingdom (UK), which have been found to encourage consumers to purchase healthier food products. In addition, the AMA reaffirms its support for the review of food components that may increase disease risk and the inclusion of precautionary information on food labels for such components.

As indicated in a previous letter to the FDA on January 5, 2007 [to Docket No. 2002P-0122], the AMA believes that the Federal Food, Drug, and Cosmetic Act gives the FDA specific legal authority to require highlighting of important nutrient information on the food label to assist consumers in maintaining healthy dietary practices [see 21 U.S.C. 343(q)(1)]. There is evidence that consumers do not easily understand the current "nutrition facts panel" and have difficulty making appropriate judgments about which foods are the healthiest to purchase and consume (e.g., see Rothman RL et al. Patient understanding of food labels: The role of literacy and numeracy. *Am J Prev Med* 2006;31(5):391-398). The AMA continues to encourage the FDA to require food labels to contain precautionary information when the food product contains amounts of ingredients that increase the risk of developing a disease, or when the food product is problematic for individuals with certain diseases (see letters to the FDA on January 5, 2007 [to Docket No. 2002P-0122] and September 6, 2007 [in response to Docket No. 2007D-0125]).

Likewise, the AMA continues to recommend the FDA consider the development of a red-yellow-green highlighting system to identify nutrients that make a food product unhealthy or healthy. This system could be used on both the current nutrition facts label and on the front panel of product labels. For example, on the current nutrition facts label, food products containing high levels of saturated fat, cholesterol, or sodium would have the relevant nutrient(s) highlighted in red, as would any product containing *trans* fat. Criteria for high (red), medium (yellow), and low (green) levels of nutrients could be established using an evidence-based review system to evaluate both the health risks and benefits of various food components, similar to the FDA's proposed review system for health claims [Docket No. 2007D-0125]. The front panel of the label could highlight saturated fat, added sugars, and salt in a traffic light format similar to that used in the UK, as described by Claire Boville of the FSA in the FDA's Public Hearing on this topic September 10-11, 2007. Combined with an extensive consumer education campaign, such a system should make it much easier for consumers to differentiate healthy from unhealthy food products and to make appropriate choices.

While preliminary data indicates that UK consumers find the front of package traffic light labeling system helpful and easy to use, this system is voluntary and allows for some variation in presentation. The UK's FSA is awaiting results of an independent study to evaluate when and how consumers use different front of package nutrition signposting methods. The AMA encourages the FDA to fully consider this and other labeling systems, and to test a labeling system for its ease of use among US consumers before mandating it on food labels. At a minimum, the AMA believes that food labels should more clearly identify those food components that may increase disease risk.

In conclusion, the FDA can make food labels more informative and useful for consumers by mandating clear, concise, and uniform labeling that is based on sound science. Such labeling should be used to identify both healthy and unhealthy food components. The AMA urges the FDA to consider our specific recommendations, as discussed above, to achieve these goals. If you have any questions or need additional information, please do not hesitate to contact Suzen Moeller, PhD at 312-464-5012, or by email at Suzen.Moeller@ama-assn.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Maves", is written over a thin horizontal line.

Michael D. Maves, MD, MBA