



June 26, 2014

Food Labeling: Revision of the Nutrition and Supplement Facts Labels

Good afternoon! I am Sarah Ohlhorst with the American Society for Nutrition. ASN appreciates the opportunity to provide comments regarding the proposed revisions to the Nutrition Facts label. ASN is a scientific, professional society with more than 5,000 members who conduct nutrition research. ASN applauds FDA for undertaking a major revision to the label, and for a commitment to chronic disease prevention through nutrition.

ASN recommends that adequate consumer testing be conducted before implementation of the label for a number of proposed revisions, such as the proposed and alternate formats of the label. Adequate consumer testing to determine understanding, interpretation, and use of the terms dietary fiber and added sugars relative to other relevant terms on the food label is necessary. Consumer studies to determine how and if declaration of added sugars impacts healthful eating are highly important and should be conducted as well.

ASN has concerns with FDA's rationale for the inclusion of added sugars on the food label. This is a controversial topic and there remains a lack of consensus in the scientific evidence on the health impact of added sugars alone versus sugars as a whole. There is also a lack of evidence on the usefulness of a declaration of added sugars on the label to improve food choices and the health of consumers. Therefore, ASN recommends additional consumer testing, careful consideration of the totality of the scientific evidence, and consideration of compliance and other technical issues.

ASN urges FDA to make guidance related to evidence necessary to demonstrate physiological effects of synthetic, isolate, and novel fibers beneficial to human health publicly available for comment *before* FDA finalizes its approach. ASN recommends that FDA follow a process aligned with Health Canada's approach and include a core list of physiological effect(s) for which FDA will consider submissions in their guidance.

ASN supports the rationale for the proposed DRV of 2,300 mg of sodium per day. This number reflects the best available scientific data¹ on the relationship between sodium and health outcomes at this time, as well as the desirability to have dietary recommendations that are achievable for most Americans. Although daily intake below 2,300 mg is desirable in some individuals, particularly those at risk of hypertension, the 2,300 mg recommendation seems most achievable given the current food supply and intake levels of approximately 3,650 mg of sodium per day in the general US population.

ASN notes that the food environment and consumer education both play a significant role in

¹ Institute of Medicine. *Sodium Intake in Populations: Assessment of Evidence*. Washington, DC: The National Academies Press, 2013.

translation and understanding of the food label to make healthier choices. ASN strongly recommends that FDA conduct a comprehensive consumer education campaign, including a significant focus on calories, serving size, and new elements of the label, prior to use of the revised label. ASN urges FDA to fully involve all stakeholders in the implementation of the revised label and any related consumer education campaigns.

Thank you for your time. ASN will submit more detailed written comments to the docket.