Food and Drug Administration, Public Meeting

Re: Docket No. FDA-2012-N-1210

Proposed Rules on the Nutrition and Supplement Facts Labels

Public Testimony of:

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The Sugar Association

Washington, D.C.

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My name is Andy Briscoe and I am the President of the Sugar Association. The Sugar Association represents US sugar cane and sugar beet farmers and processors.

We greatly appreciate the opportunity to provide comments on the FDA’s Nutrition Facts Panel Proposed Rule.

These comments reflect our position on sugar (sucrose). The Association has for a long time been on record objecting to the use of the term “added sugars” as misleading and without scientific justification.

The Association recognizes that one of FDA’s objectives is to assist consumers in making healthy food and beverage choices.

- However, we have serious concerns about the use of selective dietary guidance, from one edition of the Dietary Guidelines for Americans, as the sole basis for proposing sweeping labeling regulation changes. General dietary guidance to increase or reduce certain foods has merit for the general population, however there is not a preponderance of science to support the “added sugars” recommendation, as required by law.1

- In fact, the Nutrition Evidence Library scientific literature reviews conducted by the 2010 Dietary Guidelines Advisory Committee, did not find that “added sugars” intake contributes to nutrient displacement, displacement of nutrient-rich foods and, as FDA has stated, obesity or heart disease. 2

- And, the 2010 Dietary Guidelines specifically state that USDA Food Patterns suggested intakes “have not been tested for health benefits.”3

We also strongly emphasize that no authoritative scientific body including the IOM4 and European Food Safety Authority5, has found a public health need to set an Upper Level for “added sugars” intake. This fact and the lack of sufficient science to support the Dietary Guidelines recommendation contradicts the contention that monitoring “added sugars” on product labels is necessary for Americans to maintain healthy dietary practices. Further, FDA’s own definition of healthy does not take sugars into consideration.

The lack of science to justify “added sugars” labeling and the fact that FDA must require every food and beverage manufacturer to keep written records on thousands of products in order to enforce this proposed regulation, sets a dangerous precedent for this and future labeling regulations.
Therefore, we encourage the Agency to maintain its strong commitment to science and withdraw its “added sugars” labeling proposal in the NFP Proposed Rule.


2 Available at: [http://www.nutritionevidencelibrary.gov/](http://www.nutritionevidencelibrary.gov/)

