

October 11, 2018

Scott Gottlieb, M.D.
Commissioner
Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Commissioner Gottlieb:

We respectfully submit this letter as a comment to the Food and Drug Administration's (FDA's) "Comprehensive, Multi-Year Nutrition Innovation Strategy." Overall, we appreciate the agency's commitment to align food labels with dietary advice.

The stakes are high: roughly 72 percent of adults and 35 percent of children and teens are now overweight or obese. Approximately 45 percent of adults now have diabetes or prediabetes. Every time a consumer is looking for healthier food and instead is sold a food or beverage that undermines their health, that is a missed opportunity to reduce diet-related disease.

Consumers do pay attention to labels: studies show that more than half of consumers look at the nutrition facts panel or ingredient list "often" or "always" when making a purchasing decision, while 40 percent consider other labeling statements about health or nutrition benefits.

Contrary to the sound recommendations of the 2015 *Dietary Guidelines for Americans*, Americans under-consume healthful foods: in particular, fruits and vegetables, low-fat dairy, and whole grains. We also over-consume unhealthful added sugars, saturated fats, and sodium.

It is therefore critical that FDA's initiative seeks to correct misleading or inaccurate labeling claims on unhealthful foods and does not enable such foods to unfairly compete even more readily with fruits and vegetables and other healthful options.

For these reasons, we believe FDA should focus on the following topics:

- 1) FDA should strengthen the definition of "healthy" and review a full range of options for front-of-package nutrition labeling programs.***
- 2) FDA should improve labeling of whole grains to enhance transparency for consumers and encourage healthful reformulation of grain-containing foods.***
- 3) FDA should improve health and transparency by addressing deceptive labeling.***
- 4) FDA should improve standards of identity and ingredient lists.***
- 5) FDA should complete its critical work on nutrition education and sodium reduction.***

We appreciate the opportunity to comment and look forward to working with the agency on solutions that generate greater transparency on food labels in the service of public health.

Sincerely,

Academy of Nutrition and Dietetics
Adrian Dominican Sisters, Portfolio Advisory Board
American Diabetes Association
American Institute for Cancer Research
American Public Health Association
Association of State Public Health Nutritionists
Center for Science in the Public Interest
Consumer Federation of America
Consumers Union
Dominican Sisters, Grand Rapids
Illinois Public Health Institute
Interfaith Center on Corporate Responsibility
Mercy Investments Services, Inc.
National Association of County and City Health Officials
National Association of Pediatric Nurse Practitioners
National Consumers League
National WIC Association
Real Food for Kids
Sisters of St. Dominic of Caldwell, NJ
Sisters of St. Francis of Philadelphia
Socially Responsible Investment Coalition
The Poverello Center, Inc.
The Praxis Project
Trust for America's Health