

May 15, 2018

The Honorable John Hoeven  
Senate Appropriations Subcommittee on  
Agriculture, Rural Development, Food and  
Drug Administration, and Related Agencies  
Washington, DC 20510

The Honorable Jeff Merkley  
Senate Appropriations Subcommittee on  
Agriculture, Rural Development, Food and  
Drug Administration, and Related Agencies  
Washington, DC 20510

Dear Chairman Hoeven and Ranking Member Merkley:

On behalf of the undersigned organizations, we write in opposition to the FY2019 House Agriculture Appropriations rider (Section 764) that exempts honey and maple syrup products from listing the amount of added sugars on the Nutrition Facts label consistent with the final rule “Food Labeling: Revision of the Nutrition and Supplement Facts Labels” (81 Fed. Reg. 33742). **We similarly oppose a rider in the Senate Appropriations bill. The House rider would not only exempt honey and maple syrup products from disclosing added sugars on the Nutrition Facts label, but could also prevent or significantly delay implementation of the final rule, which has already been delayed by 18 months.**

We do not think Congress should intervene with the update to the Nutrition Facts label, which was developed over a two-year period with significant stakeholder engagement and public input from the food industry, public health and consumer groups, and researchers and scientists. The Food and Drug Administration (FDA) received nearly 300,000 comments, conducted and publicized several consumer studies, and incorporated scientific recommendations, particularly for added sugars. The result of this science-based process with stakeholder input balanced industry concerns for updating the label with the public health benefit of disclosing added sugars in products.

The updated Nutrition Facts label now has an “Added Sugars” line, along with a corresponding Daily Value, to help consumers meet key recommendations from the Dietary Guidelines for Americans to reduce intake of calories from added sugars and to consume no more than 10 percent of calories from added sugars. Declaration of added sugars on the Nutrition Facts label is of great public health importance, especially given that two out of three adults and one out of three children are overweight or have obesity, and one out of three adults has prediabetes. **Omission of the “Added Sugars” line from honey or maple products would mean that these foods would lack information on the “Daily Value” for added sugars and that consumers may not understand that they contribute to their daily intake of added sugars.**

Consumers must be able to know the amount and corresponding Daily Value of added sugars in food products in order to limit added sugar intake. Added sugars, including those in honey and maple syrup, are linked to a higher risk of weight gain, type 2 diabetes, and heart disease. Small amounts of these products can significantly contribute to one’s daily added sugar intake. For example, a one-tablespoon serving of honey has about a third of a day’s added sugar, and a two-tablespoon serving of maple syrup has half a day’s added sugar.

Companies claim that consumers might misinterpret the added-sugars declaration to mean that pure honey or maple syrup have been adulterated with sweeteners like corn syrup and contain less than 100 percent of their primary ingredient. Some manufacturers of the products included in the rider are already moving forward with the new Nutrition Facts label and we have not noticed any consumer confusion. Concerns from these industry groups are better addressed through the guidance currently being developed by the FDA. As proposed in the draft guidance, honey and maple syrup products could include a footnote that puts the added sugars into context. Companies also can use far more prominent product names or front-of-package claims to describe the contents, such as “100% pure honey” or “100% pure maple syrup.” Furthermore, companies have the option of including an ingredient list on their labels, which would clarify that the product contains only honey or maple syrup and no added sweeteners.

Clearly, honey and maple syrup companies have multiple ways to address concerns about labeling added sugars on their products while preserving the critical public health benefit of the “Added Sugars” line on the new Nutrition Facts label. The “Added Sugars” line and corresponding percent Daily Value ensure that consumers understand just how much added sugar a serving contains and how it fits into their recommended daily intake. **There is simply no need for additional legislative measures that would further confuse consumers about added sugars.**

Sincerely,

Academy of Nutrition and Dietetics  
American Diabetes Association  
American Public Health Association  
Center for Science in the Public Interest  
National Association of County and City Health Officials (NACCHO)  
National WIC Association  
Trust for America’s Health