

February 23, 2012

The Honorable Margaret Hamburg, M.D.
Commissioner
U.S. Food and Drug Administration
U.S. Department of Health and Human Services
10903 New Hampshire Avenue
Silver Spring, MD 20993-0002

Dear Commissioner Hamburg,

Thank you for your continued leadership at the Food and Drug Administration. On behalf of the undersigned organizations, we are writing to encourage you to take an important step to provide consumers with full information on added sugars in food.

With more and more consumers trying to make informed choices about the foods they eat, the FDA has the ability to help shoppers get more information to make smart decisions. While current regulations stipulate what foods can be labeled “No Sugar Added” or use a similar phrase, there is currently no requirement that added sugars be shown separately on the “Ingredients List.” We recommend that FDA require that added sugars be listed on the ingredients section of food labels so that consumers can make healthier choices when they shop.

Our country is battling an obesity epidemic. According to the Centers for Disease Control and Prevention more than 33% of adults and approximately 17% of children and adolescents are obese. In 2010, 36 states had obesity rates of more than 25%. According to the American Heart Association (AHA), the overconsumption of added sugars contributes to obesity.

The AHA also notes that national survey data indicates that the usual intake of added sugars for Americans is 22.2 teaspoons per day, which is equivalent to 355 calories, despite the recommended daily limit that women get only 100 daily calories and men only 150 from added sugars. According to the World Health Organization, children with a high consumption of soft drinks with added sugars are more likely to be overweight.

While a healthy, well-balanced diet contains naturally occurring sugars, the “empty calories” from added sugars like high fructose corn syrup, sucrose and corn sweetener, have a detrimental effect on our diets. By showing “added sugars” on the ingredients lists of foods, consumers will be better able to evaluate the foods they purchase.

To ensure consumers have this important information, we feel that the term “added sugars” should be listed as a single food ingredient with a parenthetical list of the specific ingredients that account for those sugars. The specific added sugars should be listed by descending weight, in line with current regulations. The combined weight of the added sugars should be used to determine where added sugars rank on the food ingredients label.

Millions of American shoppers are trying to eat healthier, but to do so they need clear information on the ingredient label. Many in the sugar and food industry like to encourage personal responsibility over government regulation of food and ingredients. Without specific information on the amount of “added sugars” on the labels of food products, consumers can hardly exercise that responsibility and make smarter choices in the grocery aisle.

Thank you for your consideration of this proposal and thank you for your continued work to protect the health of all Americans.

Sincerely,

Environmental Working Group

American Association for Health Education

American Heart Association

Center for Science in the Public Interest

Corporate Accountability International

Defeat Diabetes Foundation

American Association for Health Education

National Association of School Nurses

Young People’s Healthy Heart at Mercy Hospital

Indiana Rural Health Association

American Society of Bariatric Physicians

The FGE Food & Nutrition Team

Cambridge/Somerville WIC

Iowa Public Health Association