

July 29, 2014

Margaret Hamburg, MD  
Commissioner  
U.S. Food and Drug Administration  
Division of Dockets Management (HFA-305)  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

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

Dear Commissioner Hamburg:

On behalf of the physician and medical student members of the American Medical Association (AMA), we appreciate the opportunity to offer comments to the U.S. Food and Drug Administration (FDA) in support of its proposal to amend the Nutrition Facts Label to assist consumers in maintaining healthy dietary practices. We believe this is an important topic for physicians and patients alike.

The AMA has committed its resources, expertise and reach to prevent heart disease and type 2 diabetes, and to improve outcomes for people suffering from these diseases. By improving the Nutrition Facts Label, consumers will be better equipped to improve their diets, which will aid in the prevention and management of these expensive and debilitating chronic medical conditions. The AMA agrees with Dr. David Kessler, former FDA Commissioner, that the FDA's proposed updates to the Nutrition Facts label provide a critical opportunity to influence the course of the obesity epidemic. (N Engl J Med. 2014; 371(3):193-195)

The AMA has long-standing policies on obesity prevention, sugar-sweetened beverage consumption, and reducing sodium intake that serve as guidance for our comments on the proposed changes to the Nutrition Facts Label. An underlying principle in these policies is a recommendation to improve consumer education on positive health impacts associated with healthier food and beverage consumption. An enhanced nutrition label is a very important tool in implementing this strategy.

The AMA supports the inclusion of "Added Sugars" in the Nutrition Facts Label. The Department of Agriculture's Dietary Guidelines urge Americans to limit their consumption of added sugars. The Guidelines suggest that reduced intake of added sugars allows for increased intake of nutrient-dense foods which may help individuals to control their total caloric intake and better manage their weight.

An omission in the FDA proposal is a Daily Value (percent DV) for added sugars, which would let consumers quickly see whether a food is low or high in added sugars. Including a percent DV for added sugars would help educate consumers about the "hidden" sugars in many packaged foods that add calories without adding nutritional value to packaged foods.

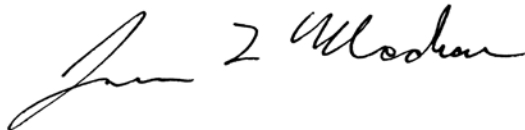
Margaret Hamburg, MD  
July 29, 2014  
Page 2

The AMA further recommends that the FDA consider establishing a recommended percent DV for added sugars in accordance with the American Heart Association's guidelines (Circulation. 2009; 120(11):1011-1020), to further encourage consumers to limit their daily intake of added sugars. The AMA also encourages additional research into studies of all forms of sugar and its addictive potential.

In 2006, the AMA published recommendations to help reduce the amount of sodium in processed and restaurant food. These recommendations were designed to help change the way Americans think about salt as well as emphasize the importance of being aware of various sources of sodium intake in their daily lives. At that time, the AMA also called for improving labeling to assist consumers in understanding the amount of sodium in processed and packaged foods. Therefore, the AMA fully supports the FDA's proposal to reduce the threshold for estimating percent DV for sodium from 2,400 mg (milligrams) to 2,300 mg, as recommended in the Dietary Guidelines for Americans.

Enhancing the Nutrition Facts Label to reflect the latest in scientific research on the health effects of food and beverage consumption will have a positive impact on consumer diets and improve health outcomes.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Madara". The signature is written in a cursive style with a large, sweeping initial "J".

James L. Madara, MD