



March 2, 2007

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U.S. Food and Drug Administration  
Division of Dockets Management,  
5630 Fishers Lane, room 1061,  
Rockville, MD 20852

RE: **Docket 2004P-0464** updating health claim for calcium and osteoporosis

The Society for Nutrition Education (SNE) is responding to the announcement in the Federal Register, volume 72, number 3, Friday, 1/5/2007 on "Food Labeling: Health Claims; Calcium and Osteoporosis, and Calcium, Vitamin D, and Osteoporosis."

SNE is an international organization of over 1,100 nutrition education professionals dedicated to promoting healthful, sustainable food choices and sharing a vision of healthy people in healthy communities. Our members conduct research in education, behavior, and communication; develop and disseminate innovative nutrition education strategies; and communicate information of food, nutrition and health issues to students, professionals, policy makers, and the public. Articles describing this work can be found in SNE's peer-reviewed *Journal of Nutrition Education and Behavior* and SNE's website: [www.sne.org](http://www.sne.org).

SNE commends the FDA proposal's intent to simplify health claims for osteoporosis risk reduction for foods and dietary supplements, to omit the reference to a particular demographic (teens and young adult white and Asian women); to extend the scope from calcium to include vitamin D, as verbalized in the model health claims "Physical activity and adequate calcium (or calcium and vitamin D) throughout life, as part of a well-balanced diet, may reduce the risk of osteoporosis" and "Adequate calcium (or calcium and vitamin D) as part of a healthful diet, along with physical activity, may reduce the risk of osteoporosis in later life."

As long as the accuracy and integrity of the health claim is not compromised, simplifying information on food labels is a laudable goal. Doing so enables more consumers to understand and utilize the information presented in label claims. Omitting reference to teens and young adult white and Asian women is appropriate, since the benefits of ingesting adequate calcium and vitamin D apply to both sexes at all ages and race categories. Similar, identifying the mechanism by which calcium reduces the risk of osteoporosis is reasonable, given the need for brevity.

While we understand and endorse the need for simple language in label claims, SNE is concerned that the potential for consumers to be misled will increase if FDA discontinues the requirement that the claim state there are limits to benefit of calcium and Vitamin D intakes above 200 percent of the Daily Value. Dropping the requirement to state that "total intakes of greater than 2,000 mg calcium provide no added benefit to bone health" means the claims will

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[Society for Nutrition Education](http://www.sne.org) ♦ [7150 Winton Drive, Suite 300](http://www.sne.org) ♦ [Indianapolis, IN 46268](http://www.sne.org)

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no longer remind consumers of an often-overlooked principle, i.e. that more is not always better when it comes to nutrients, especially in the form of supplements or fortification. SNE believes that it is preferable to maintain this requirement unless or until consumer research can demonstrate that such information is no longer necessary.

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In summary, SNE endorses the intent to simplify this label claim, to remove the requirement for language on the demographic groups most affected and the physiological mechanism on which the claim is based. SNE is concerned that omitting the reference to limited benefits with unusually high intakes of calcium and/or vitamin D will make it more difficult to dispel the common belief that higher intakes are always better.

Thank you for your efforts to inform and educate the public with a series of approved health claims based on up-to-date scientific evidence.

Sincerely,



Robin A. Orr, PhD  
President  
Society for Nutrition Education

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