



September, 2007

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: Docket No. 1998N-0359 Program Priorities in the Center for Food Safety and Applied Nutrition

The Society for Nutrition Education (SNE) is pleased to have this opportunity to provide comment as the U.S. Food and Drug Administration Center for Food Safety and Applied Nutrition (FDA/CFSAN) establishes its FY2008 program priorities, as part of its annual planning, budgeting, and resource allocation process. **SNE urges FDA/CFSAN to devote as many of its resources as possible to maintaining, improving and evaluating the information provided to consumers on labels of food products and dietary supplements.**

SNE is an international organization 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 on 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.

FDA/CFSAN's work to assure accurate, reliable and understandable nutrition information on labels of food and dietary supplements is essential for the health of Americans. Indeed, the *Dietary Guidelines for Americans, 2005* states that along with the USDA Food Guide (*MyPyramid*), "the food label and Nutrition Facts Panel provide information that is useful for implementing the key recommendations in the *Dietary Guidelines* and should be integrated into educational and communication messages."

If FDA/CFSAN were not able to devote adequate resources to assuring accurate, reliable and understandable nutrition information on product labels, major national health initiatives would be weakened. Examples include the *HealthierUS* initiative (see <http://www.healthierus.gov/nutrition.html>) and *Healthy People 2010* which recognizes the importance of health communication and states that labels are essential tools for consumers in selecting healthful diets and reducing their risk of overweight/obesity (see <http://www.healthypeople.gov/data/midcourse/html/focusareas/FA19Opportunities.htm>)

SNE encourages FDA/CFSAN to maintain its practice of providing useful information on nutrient content and ingredients in food products and dietary supplements. We also urge you to improve these resources by including information on country of origin whenever practical and by evaluating consumers' understanding and use of information on food and supplement labels. Government agencies, nutrition educators, and other health professionals need better knowledge of how these tools are used by healthy adults and they need better information on how these resources are currently used and could become more valuable to consumers with critical needs such as individuals with hypertension or diabetes, children, older adults, and people with low literacy.

Expanding the scope of food and nutrition information that is provided to consumers is another critical need that should be addressed in CFSAN's priorities for FY2008 and beyond. Specifically, practical regulations should be implemented to provide more information on calories, key nutrients and components such as sodium, added sugar and *trans* fats on restaurant menus as Americans consume more and more of their food away from home.

Health claims and related label statements have rapidly expanded in recent years, to the point that consumers are often confused and frustrated by the array of icons and complex messages appearing on the labels of food and dietary supplements. SNE urges FDA/CFSAN to step up its efforts to provide regulations that would assure consumers that label claims are meaningful and reliable.

In summary, the SNE commends FDA/CFSAN for its valuable work in regulating and monitoring labels on food products and dietary supplements. SNE urges FDA/CFSAN to strengthen its work in this vital area so that Americans can have the best information possible as they strive to make better choices in nutrition and health.

Sincerely,

A handwritten signature in black ink that reads "Debra Palmer Keenan". The signature is fluid and cursive, with a large initial "D" and "K".

Debra Palmer Keenan, PhD, MEd
President