

Tuesday, September 26

Scott Gottlieb, M.D.
Commissioner
Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Commissioner Gottlieb:

We, the undersigned organizations, urge the FDA to issue guidance for single-ingredient sweeteners such as table sugar, pure honey, and maple syrup that maintains clear and specific labeling requirements for the percent daily value on the “Total Sugars” line and use of the term “Sugars” in place of “Total Sugars.”

We were pleased to read in the Commissioner’s September 6th statement that the agency anticipates issuing final guidance for these manufacturers well in advance of the January 2020 compliance date for the updated Nutrition Facts label and is “not considering changes to the required percent daily value for these products, including for products like pure honey and maple syrup.”¹ We agree that a solution must strike the balance between addressing industry concerns that consumers may perceive their products as adulterated while maintaining the information on the percent daily value, which informs consumers about how much these sugars contribute to their daily “budget” for added sugar intake.

Small amounts of these products can be significant for one’s daily added sugar intake. For example, one tablespoon of honey has about a third of a day’s added sugars, and two tablespoons of maple syrup contain half a day’s added sugars. Without the percent daily value, consumers would simply not know how much these products contribute to a day’s worth of added sugars.

Added sugars, including those in honey and maple syrup, are linked to a higher risk of weight gain, type 2 diabetes, and heart disease. Ensuring that consumers can make informed choices about their added sugars intake from the Nutrition Facts label is of great public health importance, especially given that two in three adults and one in three children are overweight or have obesity, and that one in three adults has prediabetes.

We also request that FDA allow use of the term “Sugars” in place of “Total Sugars” for these products. The Dietary Guidelines for Americans recommends reducing calories from added sugars and that we consume no more than 10 percent of calories from added sugars. The corresponding percent daily value is designed to help consumers meet these key recommendations to reduce intake of calories from *added* sugars. The use of the term “Sugars” in place of “Total Sugars” would ensure that the label is both accurate and non-misleading in this context because all of the sugars in products such as pure honey and maple syrup are added sugars under the Guidelines and thus count toward the percent daily value for added sugars.

¹ Statement from FDA Commissioner Scott Gottlieb, M.D., on an updated approach for including added sugar information on the Nutrition Facts labels of pure maple syrup and honey. September 6, 2018. Accessed September 7, 2018: <https://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm619596.htm>.

In sum, we urge that FDA’s guidance maintain clear and specific labeling requirements for the percent daily value on the “Total Sugars” line and permit the use of the term “Sugars” in place of “Total Sugars.” Further, we thank the Commissioner for supporting the appropriate continued labeling of the percent daily value on these products.

Sincerely,

Academy of Nutrition and Dietetics
American Diabetes Association
American Heart Association
American Public Health Association
Center for Science in the Public Interest
National WIC Association
Trust for America’s Health