



August 1, 2014

Dr. Margaret Hamburg
Commissioner
Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Re: Food Labeling: Serving Sizes of Foods That Can Reasonably Be Consumed at One-Eating Occasion and Food Labeling: Revision of the Nutrition and Supplement Facts Labels

Dear Commissioner Hamburg:

The Society for Public Health Education (SOPHE) welcomes the opportunity to comment on the proposed revisions to food labels.

SOPHE is a 501 (c)(3) professional organization founded in 1950 to provide global leadership to the profession of health education and health promotion. SOPHE contributes to the health of all people and the elimination of health disparities through advances in health education theory and research; excellence in professional preparation and practice; and advocacy for public policies conducive to health. **SOPHE is the only independent professional organization devoted exclusively to health education and health promotion.** Members include behavioral scientists, faculty, practitioners, and students engaged in disease prevention and health promotion in both the public and private sectors. Collectively, SOPHE's 4,000 national and chapter members work in universities, medical/health care settings, businesses, voluntary health agencies, international organizations, and all branches of federal/state/local government.

SOPHE strongly supports the proposed revisions to the Nutrition and Supplemental Facts Labels and the Reference Amounts Customarily Consumed (RACCs) for certain food and beverage products. The proposed revisions reflect the latest public health and medical information that can assist consumers in making more healthful and informed food choices. With accurate, easy to understand information, consumers will be empowered to make more knowledgeable decisions about the foods and beverages they select for themselves and their families. Changes in the nutrition behaviors of adults and children are vital to helping curb the epidemic of obesity and overweight, which have a major toll on morbidity, mortality as well as the economy.

SOPHE also recommends that FDA take additional steps that would make the food label even more meaningful to consumers. Because some consumers view serving sizes as portion recommendations, SOPHE recommends that the FDA include clarifying language on the label by either: 1) denoting the serving size provided as a "typical" serving size or 2) including a footnote to clarify that "the serving size is based upon the amount typically consumed, and is not a recommended portion size."

In addition, SOPHE recommends that manufacturers be required to disclose how much sugar is added to a food product, distinguishing it from the total sugar that is intrinsically present. Research shows that indicating the amount of added sugars in terms of teaspoons, rather than grams, is more understandable to Americans. To provide context for consumers about the products they are selecting, the FDA should

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consider a proposed Daily Value (DV) for added sugars. These recommendations are in the spirit of the existing proposal and will allow better consumer comprehension of choices being made. The Institute of Medicine's 2014 workshop summary on *Health Literacy and Health Numeracy* documents that "most Americans have limited numeracy skills, and disparities exist in those skills. People who are less numerate are more likely to be female, to be older, to be less educated, and to have lower income." Thus, providing simpler, clearer food labeling information is needed to reach a larger segment of the population.

The Role of Health Education to Influence Healthy Eating

SOPHE supports the FDA's consideration of increased education efforts to help consumers understand serving size and labeling changes, following publication of these proposed rules. Augmenting the proposed new Food Labels and the Nutrition and Supplemental Facts Labels with health education programs that convey necessary information about foods and health can allow people to make positive changes in their eating behavior. These subsequent changes could result in the reduced incidence of diseases that can result from unhealthy eating in both youth and adults.

SOPHE strongly urges the FDA to utilize the skills of Health Education Specialists when developing and implementing consumer education programs. Health Education Specialists work to encourage healthy lifestyles and wellness through educating individuals and communities about nutrition and other behaviors that can prevent diseases, injuries, and other health problems. Although many professionals may possess the requisite skills to analyze the new, simpler and more informative labels, Health Education Specialists are equipped to provide the necessary education to more vulnerable populations. A core competency of Health Education Specialists is communicating with and understanding the needs of the underserved, vulnerable and/or limited English-speaking populations, including those who are disabled and suffer from one or more chronic diseases. Health education specialists also supervise community health workers, i.e. trusted members of the community served, who can facilitate access to priority populations, and improve the cultural competence of the education or service delivery.

Given the wide range of populations with which they work and the diverse settings in which they are employed, health education specialists have significant capacity to conduct education about the new food label to millions of Americans. Their skills in health communications, cultural competency, community engagement, community needs assessment, health coaching, and inter-disciplinary collaboration make them natural leaders in FDA's quest for healthier America.

SOPHE stands ready to work closely with FDA at the national level and through our 20 chapters covering more than 30 states to develop and provide effective consumer education about the new nutrition labels. It is vital that consumers understand the benefits of these proposed changes and are empowered to make informed decisions that will improve their individual, family, and community health.

Thank you for consideration of our comments and we look forward to working with you further. Please contact Jerrica Mathis at (jmathis@sophe.org) or 202-408-9804 with any additional questions.

Sincerely,



Elaine Auld, MPH, MCHES
Chief Executive Officer