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Agency Information Collection Activities; Submission for Office of Management and Budget Review; Comment Request; Quantitative Research on Front of Package Labeling on Packaged Foods; Docket No. FDA-2023-N-0155

The American Frozen Food Institute (AFFI) appreciates the opportunity to comment on the Food and Drug Administration's (FDA's) second procedural notice regarding quantitative research on front of package (FOP) labeling on packaged foods. From manufacturers to distributors to suppliers to packagers, AFFI is proud to represent publicly traded and family-owned companies who help produce frozen foods and beverages for today's food service and retail marketplace and serve as economic pillars within their communities throughout the U.S. The frozen food industry contributes approximately \$65.1 billion to U.S. GDP and accounts for 670,00 U.S. jobs. In addition to our members' strong role in economic growth, AFFI members share a commitment to food safety and transparently communicating information about the nutritional profile of the foods they produce and sell.

AFFI continues to have a significant interest in the agency's work in investigating a standardized front-of-pack nutrition labeling (FOPNL) scheme, having submitted detailed comments on the agency's initial 60-day notice of its proposed collection of information on this important topic. We appreciate the additional information the agency shares in this second procedural notice, including the overall study design, mock product labels, and planned FOPNL schemes for testing. Given the importance of the planned study, and its significance in shaping any future standardized FOPNL scheme, however, we urge the agency to continue to incorporate feedback from stakeholders to maximize the utility of the study and ensure it produces truly actionable information that furthers public health goals. To that end, we offer additional thoughts on three key areas of concern for AFFI members raised by the second procedural notice:

See more detailed comments in the attached document.