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Dockets Management Staff (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

July 17, 2023

Re: 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

To whom it may concern:

The undersigned organizations are members of the Food and Beverage Issue Alliance (FBIA), a coalition of more than 50 food and beverage trade associations representing the supply chain from ingredient suppliers and food manufacturers to retail and restaurants. We appreciate the opportunity to provide comments on the U.S. Food and Drug Administration's (FDA) second procedural notice regarding quantitative research on front of package (FOP) labeling on packaged foods. Our organizations have an abiding interest in any FOP nutrition labeling on packaged foods.

The undersigned organizations appreciate the additional information FDA shares in this second procedural notice, including the overall study design, mock product labels, planned FOP nutrition labeling schemes for testing, and results of the agency's review of the literature on the effectiveness of FOP schemes from other countries. However, given the complexity of the material and the consequential nature of the agency's work, we feel strongly that the 30-day timeline for comments is not sufficient. More time is needed by the food and beverage industry to fully understand the information and compile detailed feedback that will help the agency formulate a scheme to advance public health goals.

Our organizations thank FDA for the opportunity to comment on the second procedural notice regarding quantitative research on FOP labeling on packaged foods. We hope that our comments will be shared with FDA's Center for Food Safety and Applied Nutrition. Please do not hesitate to contact our organizations if we can provide further information in support of these comments.

Sincerely,

American Bakers Association
American Frozen Food Institute
Corn Refiners Association
FMI - The Food Industry Association
Juice Products Association
National Automatic Merchandising Association
National Pasta Association
National Seasoning Manufacturers Association
North American Millers' Association

Peanut and Tree Nut Processors Association (PTNPA)
SNAC International
The Association for Dressings & Sauces
The Sugar Association