

July 17, 2023

Honorable Richard Revesz  
Administrator  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
725 17th Street NW  
Washington, DC 20503

Re: OMB Control Number 0910-NEW—Quantitative Research on Front of Package  
Labeling on Packaged Foods (Docket No. FDA-2023-N-0155)

Dear Administrator Revesz:

On behalf of our 159,000 members, we would like to comment on the Food and Drug Administration's proposal to conduct a quantitative study on front of package labeling on packaged foods. We offer these comments in response to the agency's Federal Register notice of June 15, 2023 (88 FR 39257).

FDA is proposing to study whether a new front of package labeling system will lead consumers to make healthier food choices. Specifically, FDA is examining whether consumer behavior will be influenced by labeling foods as "healthy," "high in salt," etc.

In the quantitative study, we urge FDA to ensure that labels identifying a food's sugar content be accompanied by a statement indicating that sugar may increase the risk for tooth decay, obesity, cardiovascular disease, kidney disease, and other systemic conditions. This applies regardless of whether the sugar is natural or added. We also urge caution about labeling foods as "healthy" without identifying the systemic health conditions they will benefit.

*No amount of sugar* can be consumed without increasing the risk for tooth decay. Sugar increases the build-up of plaque (a sticky, colorless, bacterial film), which weakens enamel and can potentially form a cavity. This applies regardless of whether the sugar is natural or added.

We support the general concept of labeling foods as "healthy". However, we urge you to consider that some packaged foods intuitively thought of as healthy may not be healthy for all health conditions.

For example, some fiber-rich foods (e.g., cereals, trail mix, granola bars, etc.) may contain honey and other natural ingredients that are high in sugar, and possibly a modest amount of added sugar. The fiber content may be a healthy option to control cholesterol and lower the risk for heart disease. However, even a modest amount of sugar increases the risk for dental caries, obesity, cardiovascular disease, kidney disease, other systemic conditions. It can also complicate the management of diabetes.

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We recognize that it is neither practical nor possible to remove all sugary foods from the human diet, or to identify nutrient-rich foods as unhealthy based on the sugar content alone. Even milk has a measurable amount of sugar. However, it is still essential for consumers to know that even a modest amount of sugar can increase the risk for tooth decay. The FDA's study can help us learn whether that knowledge will lead consumers to purchase low-sugar (or ideally sugar-free) foods.

Again, in the quantitative study, we urge FDA to ensure that labels identifying a food's sugar content be accompanied by a statement indicating the food may increase the risk for tooth decay. This applies regardless of whether the sugar is natural or added. We also urge caution about labeling foods as "healthy" without identifying the health conditions they will benefit, as *any* amount of sugar will increase the risk for tooth decay.

Thank you for providing us the opportunity to comment. If you have any questions, please contact Mr. Robert J. Burns at 202-789-5176 or [burnsr@ada.org](mailto:burnsr@ada.org).

Sincerely,



George R. Shepley, D.D.S.  
President



Raymond A. Cohlma, D.D.S.  
Executive Director

GRS:RAC:rjb