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The National Confectioners Association (“NCA”) appreciates the opportunity to provide input on FDA’s second procedural notice on consumer research on front of package labeling. NCA is the leading trade organization for the U.S. confectionery industry, which generates \$37.5 billion in retail sales each year. NCA advocates for an environment that enables candy makers to thrive and works to ensure that chocolate, candy, gum, and mints are celebrated for their contributions to culture, society, the economy, and everyday moments of joy. The industry employs nearly 58,000 workers in more than 1,600 manufacturing facilities across all 50 states and supports an additional 635,000 jobs in related fields. The U.S. confectionery industry has delivered on its commitment to increase transparency, provide more portion guidance options, and educate consumers about the role of confectionery in a happy, balanced lifestyle.

NCA provides these comments as a follow up to comments submitted on FDA’s first procedural notice in March 2023. As noted in previous comments, through NCA’s long standing commitment to its Always A Treat initiative, the confectionery industry has utilized front of pack (“FOP”) labeling to provide consumers with calorie information. NCA fully supports efforts to provide consumers with information about the nutritional content of foods to help them make informed choices. NCA urges the FDA to consider the following suggestions and revise the proposed quantitative research design on FOP labeling.

NCA respectfully requests that the following comments are shared with the Office of Nutrition and Food Labeling within the Center for Food Safety and Applied Nutrition as the agency proceeds with this initiative.

See attached file for detailed comments.