

**Chairman of the Board**  
Ron W. Haddock

**President**  
Donna K. Arnett, PhD, BSN, FAHA

**Chairman-elect**  
Bernard P. Dennis

**President-elect**  
Mariell Jessup, MD, FAHA

**Immediate Past  
Chairman of the Board**  
William H. Roach, Jr., Esq.

**Immediate Past President**  
Gordon F. Tomaselli, MD, FAHA

**Secretary-Treasurer**  
Alvin L. Royse, JD, CPA

**Directors**  
Elliott Antman, MD, FAHA  
Joyce Beatty, MS  
David A. Bush  
Robert M. Carey, MD, FAHA  
Mark A. Creager, MD, FAHA  
Shawn A. Dennis  
Johnny Lee, MD  
John J. Mullenholz  
James J. Postl  
Bertram L. Scott  
David A. Spina  
Bernard J. Tyson  
Raymond P. Vara, Jr.  
Henry J. Wasiak, MBA

**Chief Executive Officer**  
Nancy A. Brown

**Chief Mission Officer**  
Meighan Girgus

**Chief Administrative Officer &  
Chief Financial Officer**  
Sunder D. Joshi

**Chief Science Officer**  
Rose Marie Robertson, MD, FAHA

**Chief Development Officer**  
Suzie Upton

**Executive Vice President  
Communications**  
Matthew Bannister

**Executive Vice President  
Corporate Secretary &  
Emeritus General Counsel**  
David Wm. Livingston, Esq.

**Executive Vice President  
ECC Programs**  
John Meiners

**Executive Vice President  
Consumer Health**  
Kathy Rogers

**Executive Vice President  
Advocacy & Health Quality**  
Mark A. Schoeberl

**Executive Vice President  
Technology & Customer Strategies**  
Michael Wilson

**General Counsel**  
Lynne M. Darrouzet, Esq.



July 25, 2012

Division of Dockets Management  
Food and Drug Administration  
5630 Fishers Lane  
Rockville, MD 20852

Re: FDA-2012-N-0495

Dear Sir or Madam:

On behalf of the American Heart Association (AHA), including the American Stroke Association (ASA) and over 22.5 million AHA and ASA volunteers and supporters, we appreciate the opportunity to submit our comments on the proposed “Experimental Study on Consumer Responses to Nutrition Facts Labels with Various Footnote Formats and Declaration of Amount of Added Sugars”.

AHA strongly supports the inclusion of added sugars on the Nutrition Facts label and we are very pleased that the FDA is considering making this revision. Over the last few decades, the consumption of beverages and foods with added sugars has risen markedly. Added sugars now contribute an average of 16% of the total calories in the American diet.<sup>1</sup> This is particularly concerning since added sugars are generally devoid of any nutrient value; rather added sugars are a significant source of extra or empty calories, which contributes to the growing obesity epidemic.

AHA recommends that most women eat no more than 100 calories per day and men no more than 150 calories per day of added sugars. The recommendation is based on research that shows foods with added sugars tend to displace nutritious foods and are generally high in calories and low in nutritional value.

In addition to the AHA, the 2010 Dietary Guidelines, MyPlate.gov, and countless other sources of dietary guidance recommend that consumers limit consumption of added sugars. Yet this can be difficult to do because added sugars are not currently included on the Nutrition Facts label. While “sugars” is listed, the Nutrition Facts label does not distinguish between naturally occurring sugars such as those found in fruit or milk, which are associated with other important components inherent to foods such as vitamins and minerals, and added sugars, which are not. To identify added sugars, consumers must instead examine the product’s ingredient list and look for the many ingredient names that indicate the

presence of added sugars:<sup>2,3</sup>

- anhydrous dextrose
- brown sugar
- confectioner's powdered sugar
- corn sweetener
- corn syrup
- corn syrup solids
- dextrose
- fructose
- fruit juice concentrate
- glucose
- high-fructose corn syrup (HFCS)
- honey
- invert sugar
- lactose
- malt syrup
- maltose
- maple syrup
- molasses
- nectars
- pancake syrup
- raw sugar
- sucrose
- sugar
- trehalose
- turbinado sugar
- white granulated sugar

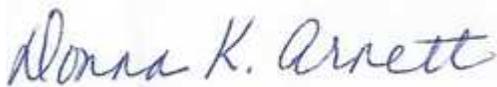
We believe that declaring the added sugars content of foods on the Nutrition Facts label would provide consumers with a significantly easier method to identify added sugars and compare products.

However, we agree that before making any major change to the Nutrition Facts label, the FDA should first conduct consumer research. Therefore, we strongly support the proposed experimental study and encourage you to conduct it as expeditiously as possible. The study will provide the FDA with valuable information on how consumers would comprehend and use the new added sugars information, including when evaluating a product's nutritional attributes and overall healthfulness.

In closing, AHA appreciates the FDA's decision to consider adding added sugars to the Nutrition Facts label and we urge you to make this a requirement in the upcoming revision of the Nutrition Facts label. The proposed study will help the Agency determine how to best provide this information in a useable and easily understandable format.

Thank you for consideration of our comments. If you have any questions, please feel free to contact Susan Bishop, AHA's manager of regulatory affairs, at (202) 785-7908 or [susan.k.bishop@heart.org](mailto:susan.k.bishop@heart.org).

Sincerely,



Donna K. Arnett, PhD, BSN  
President, American Heart Association

<sup>1</sup> Dietary Guidelines for Americans 2010. USDA and HHS. December 2010.

<sup>2</sup> Ibid.

<sup>3</sup> What are Added Sugars? ChooseMyPlate.gov. USDA. <http://www.choosemyplate.gov/weight-management-calories/calories/added-sugars.html>.