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Oral Comments on the FDA Nutrition Innovation Strategy (Docket No. FDA–2018–N–2381)

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The American Society for Nutrition (ASN) commends the FDA for its continued focus on nutrition and health, and appreciates the opportunity to comment on FDA’s Nutrition Innovation Strategy. ASN would like to comment specifically on the following topics:

- “Healthy” icon

Use of a well-defined standard “healthy” icon should be aligned with current, evidence-based dietary recommendations to help consumers select more nutrient dense food products that are part of a “healthy” eating pattern. The term “healthy” and any symbol or icon denoting “healthy” should be thoroughly informed by consumer research. Use of a standard icon should be accompanied by an updated, clear definition of “healthy” from FDA, as well as consumer education. FDA definitions of other terms such as “nutrient-dense” may also support healthy food innovation.

- Evaluating qualified health claims

A more efficient review strategy for evaluating qualified health claims should still require sufficient scientific data to support the claim and ensure that all required scientific evidence will be carefully examined. It’s important that the scientific review portion of evaluating qualified health claims not be compromised in any way to produce a more expedient review.

- Labeling statements or claims that produce more healthful foods/food choices

Dietary guidance claims related to health and recommended food groups could potentially facilitate innovation to improve consumers’ food choices. However, FDA would need to define what is a meaningful amount of a food group in a serving and set thresholds for nutrients to limit so that the product is consistent with existing scientific evidence-based Federal dietary guidance.

FDA may want to review Canada, New Zealand, and Australia’s front of pack labeling initiatives as potential examples of approaches that may promote more healthful foods and food choices.

- Modernizing standards of identity

Modernizing standards of identity could be made more flexible, simplified, or clarified to promote industry innovation and allow for healthier food products when adequate data or new manufacturing methods and technologies support lowering amounts of ingredients to limit in the standard, so long as such a change would not compromise a product's integrity or cause a public health risk.

- Helpful ingredient information

FDA may find example opportunities to make the ingredient list more helpful to consumers by looking to Health Canada's innovative changes including grouping all sources of sugar in brackets after the name 'sugars' and listing all food colors by their individual common names. FDA could also consider allowing the use of simple vitamin letter names, as opposed to chemical names.

- FDA's educational campaign for consumers about the updated Nutrition Facts Label.

ASN fully supports a comprehensive consumer education campaign with a major focus on new elements of the updated Nutrition Facts Label. It would be beneficial for FDA to collaborate with various partner organizations to help educate consumers on the new label and to pursue multiple education campaigns targeted to various stakeholders. The use of QR codes may be an innovative way to facilitate consumer education.

The FDA Nutrition Innovation Strategy is critical to the health of our nation and we thank the FDA for your efforts.