

June 12, 2024

Jim Jones
Deputy Commissioner for Human Foods
U.S. Food and Drug Administration
10903 New Hampshire Ave
Silver Spring, MD 20993

RE: Front-of-Pack Nutrition Labeling Research

Dear Deputy Commissioner Jones,

The undersigned members of the Food and Beverage Issue Alliance write with suggestions to enhance transparency, stakeholder involvement, and scientific basis for FDA's planned Front-of-Pack rulemaking.

Notwithstanding ongoing discussions regarding the authority of the Food and Drug Administration to require Front-of Pack nutrition labeling, we appreciate the Agency conducting, reviewing and considering qualitative and quantitative consumer research for the planned Front-of Pack nutrition labeling proposed rule. As the Agency continues to draft the proposal, we respectfully request the consumer data findings as well as any additional research considered be made available to the public at the earliest possible date.

Any proposed labeling rule should be based on strong scientific evidence developed through a robust and transparent process with stakeholder involvement. By providing access as early as possible to the research, interested parties will have more time to review and be better able to provide helpful and informative comments leading to a more robust and substantive rulemaking record. Furthermore, if the findings indicate a need for additional research, the work to address these can begin without delay.

Further, to strengthen the cost benefit analysis of your intended Front-of Pack nutrition labeling rulemaking, we respectfully request that FDA undertake a retrospective regulatory impact analysis of the 1992 and 2016 nutrition labeling rulemakings.

Lastly, understanding this rule's complexity, implications it could have on the consumer, and the potential for additional research to enrich the comment record, we also request a comment period on the proposed rule of 180 days.

Thank you for your efforts of transparency as you work to initiate your proposed Front-of-Pack nutrition labeling rulemaking. We look forward to reviewing the data and providing meaningful feedback during the comment period.

Sincerely,

American Bakers Association

American Frozen Food Institute

American Peanut Shellers Association

Association for Dressings and Sauces

Corn Refiners Association

FMI - The Food Industry Association

Independent Bakers Association

International Dairy Foods Association

International Food Additives Council

Juice Products Association

Meat Institute

National Pasta Association

National Seasoning Manufacturers Association

North American Millers' Association

Peanut and Tree Nut Processors Association

Refrigerated Foods Association

The Sugar Association

USA Rice