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Leading **THE WAY TO** healthy eating

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Division of Dockets Management (HFA-305)
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Docket No. 2004N-0463 Comments

Produce for Better Health Foundation (PBH) appreciates the opportunity to provide comments on advanced notice of proposed rulemaking, 21 CFR Part 101, Docket No. 2004N-0463, *Food Labeling: Prominence of Calories*.

PBH is both a member and chair of the National 5 A Day Partnership, a powerful coalition of public agencies and private organizations including the National Cancer Institute (NCI), the American Cancer Society, the Centers for Disease Control and Prevention, the United States Department of Agriculture, United Fresh Fruit and Vegetable Association, Produce Marketing Association, American Heart Association, American Diabetes Association and the National Alliance for Nutrition and Activity working in collaboration to increase consumption of fruits and vegetables for improved public health.

There is a great need to help Americans understand that increasing fruit and vegetable intake is one of the most important steps they can take to make healthy food choices and achieve better health. Fruits and vegetables play a key role in providing nutrients many Americans don't get enough of such as vitamins A and C, folate, potassium and fiber. Naturally nutrient dense, at recommended intake levels, they are associated with disease risk reduction and weight management.

The nutrition facts panel is an important tool for communicating the health benefits of fruits and vegetables and helping consumers reach recommended intake goals. Consumers need clearer information about how the calories in the foods they eat relate to their daily energy needs. PBH supports efforts to give more prominence to calories, serving sizes and the number of servings on the Nutrition Facts Panel. PBH also supports efforts to provide clearer information about how the calories relate to daily energy needs. PBH recommends that options for changes be tested with consumers as changes will only be beneficial





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if the information is presented in a way consumers can understand and apply to their lives.

PBH supports the concepts of energy and nutrient density as an approach to help consumers recognize and select healthy foods like fruits and vegetables more often. PBH recommends that FDA test energy and nutrient density concepts with consumers to determine its efficacy as a means for Americans to better understand and achieve energy balance.

PBH is grateful for the careful consideration afforded by this request for comments and for the opportunity to comment on this important issue. Please feel free to contact us if we can provide additional assistance.

Linda Brugler, MBA, RD, Nutrition Marketing Manager

