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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-0456 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-0456, *Food Labeling: Serving Sizes of products That can Reasonably Be Consumed At One Eating Occasion; Updating of Reference Amounts Customarily Consumed; Approaches for Recommending Smaller Portion Sizes.*

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 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. The nutrition facts panel is an important tool for communicating the health benefits of fruits and vegetables and helping consumers reach recommended intake goals.

The 2004 Dietary Guidelines recommend Americans eat 5-13 servings of fruits and vegetables every day depending on their age, gender and activity level. Focus groups revealed communicating recommendations as number of cups versus serving size was easier for consumers to understand. PBH has participated in a number of consumer focus groups addressing their understanding of nutrition messages and has seen first hand the extent of the confusion related to serving sizes. Appendix A gives a few examples of the variation in current NLEA Nutrition Facts serving sizes. It is little wonder consumers are confused.





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PBH applauds and supports the communication of fruit and vegetable intake goals in terms of cups. However, what is most important is that Americans take these recommendations to heart and incorporate them into their lifestyle. Consumers need a common yardstick for interpreting NLEA serving sizes. PBH suggests the serving size for fruits and vegetables not be reduced as Americans are only eating 1.8 of the 5 cups recommended for moderately active adults and teens. Daily intake has to more than double for most Americans to meet recommended goals. However, PBH strongly recommends the Nutrition Facts Panel be revised to include the equivalent number of cups and Dietary Guidelines servings the product provides so consumers have the information needed to track progress toward achieving the intake needed for optimal health.

Example 1a: Tomato Juice

NLEA Serving:	6.0 Fl. Oz (177ml)
Cup(s):	.75
Dietary Guidelines Servings:	1.5

Example 1b: Tomato Juice

NLEA Serving:	11.5 Fl. Oz (340ml)
Cup(s):	1.4
Dietary Guidelines Servings:	2.8

Example 2: Strawberries

NLEA Serving:	8 medium strawberries (147grams)
Cup(s):	1.00
Dietary Guidelines Servings:	2.0

PBH also recommends that options for including this information on the Nutrition Facts Panel be tested with consumers as changes will only be beneficial if the information is presented in a way consumers can understand and apply to their lives.

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.

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Appendix A

NLEA Serving and Dietary Guidance Serving Sizes Comparison

Product	NLEA Nutrition Facts Serving Size	Number of Dietary Guidelines “servings” in one NLEA Nutrition Facts “serving”
100% Pineapple Juice (can)	6.00 Fluid Ounces	1.5
100% Apple White Grape Juice (box)	6.75 Fluid Ounces	1.7
100% Juice concentrate (can)	8.00 Fluid Ounces	2.0
Tomato Juice (can)	6.00 Fluid ounces	1.5
Tomato Juice (can)	11.50 Fluid ounces	2.9
Raisins	¼ cup (41gms)	1.0
Raisins	3 boxes (42gms)	1.0

