

Original Draft Text of Comments Submitted by Rod Douglas to FDA on 5-28-14 (copy and pasted into the FDA's online comments submission form)

Placement of %DV values in the left column: The agency is urged to consider the logical reasons why this change would be counterproductive, making the NFP inherently more difficult to comprehend. U.S. consumers are already well-accustomed to reading written information from left to right. Data sheets, specification sheets and information tables, in this country, are nearly universally printed with the names of measure on the left and the values on the right. Having the %DV values on the left with the nutrient names on the right, as is currently proposed, will increase the time it takes for consumers to meaningfully understand and digest the information (even more so for people with a tendency towards dyslexia), effectively making the NFP information more difficult to understand overall. Any changes to the NFP format should be aimed at making the information easier to understand not more difficult.

More prominent Servings Per Container declaration: The agency is urged to consider making the Serving Size line larger and bold as well. While I understand that the agency wants consumers to more easily recognize multi-serving packages, I believe that Serving Size information should not be overshadowed by the Servings Per Container because Serving Size remains the important finite amount of food that the data in the NFP is representing and is what consumers are used to. I do not believe a valid argument exists to justify making the Servings Per Container more prominent than the Serving Size. I recommend either making them both larger and bold or keep them the same size.

Changing the heading above "Calories" from "Amount Per Serving" to "Amount per 2/3 cup": Although this redundancy has good intentions, I believe that declaring the Serving Size twice, particularly when the serving size is a fraction value (i.e. 2/3 Cup) will slow down the comprehension process for consumers. Consumers are likely to notice both instances of Serving Size being mentioned, and this may create an unnecessary distraction when a consumer is quickly trying to comprehend the NFP information. A consumer will naturally be tempted to shift their eyes back up to the Serving Size declaration at the top of the NFP to make sure they understand it correctly (especially if the Serving Size is a fraction, which it often is), which is an extra unnecessary step and a potential distraction from overall NFP comprehension.

Added Sugars declaration: I propose that natural unrefined Honey, and other natural liquid or semi-liquid, unrefined, un-concentrated, whole-food sweetening agents, should be exempted and not be considered an "Added Sugar" because it is a whole food product in unrefined/un-concentrated/whole-food form. Conversely, other so-called "natural" sweeteners that are extracted, refined and concentrated such as Agave Syrup, Maple Syrup and Evaporated Cane Juice Syrup, should be considered "Added Sugars".

Potassium declaration: Due to the fundamental importance of the relationship between Sodium and Potassium on the cellular metabolic level and the proven role that dietary Potassium plays in augmenting the relationship between dietary Sodium intake and blood pressure pathology, it should

behoove the agency to consider placing the declaration of Potassium directly below or above the Sodium declaration instead of all the way at the bottom.

Additional suggestion for Serving Size declaration of packages with 1 to 4 servings per package: I propose that the ability of consumers to understand "Cup" measures and fractions thereof accurately is overestimated by the agency. I am recommending that the agency considers requiring, for packages of food containing between 1 and 4 servings, inclusion of a fraction value of the whole package as part of the Serving Size declaration, e.g. "Serving Size....1/2 Package (55g)" or "Serving Size...1/4 Package (27g)".