

September 22, 2015

Division of Dockets Management  
HFA-305  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Re: Food Labeling: Revision of the Nutrition and Supplement Facts Labels; Supplemental Proposed Rule To Solicit Comment on Limited Additional Provisions

On behalf of the Endocrine Society (Society), we appreciate the opportunity to provide comments to the U.S. Food and Drug Administration (FDA) on its proposal to require the declaration of the percent Daily Value (DV) for added sugars on nutrition labels. Founded in 1916, the Society represents approximately 18,000 physicians and scientists engaged in the treatment and research of endocrine disorders, such as obesity, diabetes, hypertension, infertility, and thyroid disease.

The Society is supportive of the FDA's proposal to include the percent DV for added sugars on nutrition labels. Obesity is a growing epidemic in the United States which now affects more than 35% of the adult population. The prevalence of the disease among children has also increased in recent years and currently impacts more than 16% of this population. Obese individuals experience increased morbidity and mortality which contribute to increased healthcare expenditures. Between 1987 and 2001, 27% of the overall growth in per-capita health spending was attributable to increases in the prevalence of obesity.<sup>1</sup> In the future it is anticipated that combined medical costs associated with treatment of obesity-related diseases in the U.S. alone will increase by \$48-66 billion from 2010 to 2030.<sup>2</sup>

More detailed nutritional labeling may also help the increasing number of Americans with Type 2 diabetes, a condition which requires individuals to closely monitor their sugar intake. Providing consumers with greater knowledge of the sugar they are consuming through the nutrition label may have an impact on the obesity epidemic, allow patients with

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<sup>1</sup> Thorpe KE, Florence CS, Howard DH, Joski P. The impact of obesity on rising medical spending. Health Affairs (Millwood). 2004; Suppl Web Exclusives: W4-480-486.

<sup>2</sup> Wang YC, McPherson K, Marsh T, Gortmaker SL, Brown M. Health and economic burden of the projected obesity trends in the USA and the UK. Lancet. 2011; 378(9793):815-825.



diabetes better control over their condition, and help those with pre-diabetes to avoid developing diabetes.

Given the meteoric rise of obesity and diabetes in America and the cost burden associated with these diseases and their comorbidities, it is critical for individuals to be able to understand the nutritional value of the foods that they are consuming. It is difficult for clinical lifestyle recommendations to be effective when patients with obesity or diabetes are ill-informed about the amount of sugar they are consuming in relation to the recommended percent daily value. The Society's clinical practice guideline, *Pediatric Obesity*, states that "excessive intake of low-nutrient, calorie-dense, high-fat food, and sugar-sweetened beverages is a risk factor for obesity." Since consumption of these foods has doubled since 1965, a reduction in intake may be an effective way to prevent obesity and diabetes. Furthermore, the guideline suggests that clinicians promote and participate in efforts to educate children, parents, and the community about dietary and activity habits. The inclusion of the percent DV for added sugar on nutrition labels would help to bolster these efforts and to educate the public about the recommended daily sugar consumption.

The Society strongly supports the FDA's proposal and looks forward to continuing to work with the agency as it moves forward in finalizing this rule. Should you have any questions or need additional information on this important issue, please contact Meredith Dyer, Associate Director, Health Policy at [mdyer@endocrine.org](mailto:mdyer@endocrine.org) or (202) 971-3637.

Sincerely,

Lisa H. Fish, MD  
President, Endocrine Society