

May 27, 2016

Robert Califf, M.D.  
Commissioner  
Food and Drug Administration  
10903 New Hampshire Avenue  
Silver Spring, MD 20993

Dear Commissioner Califf:

On behalf of our 159,000 members, we would like to applaud the Food and Drug Administration (FDA) for addressing added sugar in its final rule amending the Nutrition Facts food labeling regulations. We are especially pleased that the revised Nutrition Facts labels will require "Added Sugars" content to be declared as a separate indented line item below the declaration of "Sugars".

Eating patterns and food choices play an important role in maintaining good oral health. From a dental perspective, a steady diet of natural and added sugars, processed starches, and low pH-level acids can damage teeth. Conversely, a lack of certain nutrients can make it difficult for tissues in the mouth to resist infection.

For years, the ADA has encouraged consumers to monitor—and minimize—their added sugar intake. Now they can do so simply by reading a nutrition label.

We would like to see more data about the extent to which dental caries rates fluctuate with changes in total added sugar consumption, and over what time periods. However, until we have better data, a Daily Value (DV) recommendation to limit added sugar consumption to less than 10 percent of daily caloric intake seems like a reasonable public health goal.

We applaud FDA for giving consumers another tool to make informed decisions about their added sugar intake. If you have any questions, please contact Mr. Robert J. Burns at 202-789-5176 or [burnsr@ada.org](mailto:burnsr@ada.org). Information is also available at [ADA.org/nutrition](http://ADA.org/nutrition).

Sincerely,

/s/

Carol Gomez Summerhays, D.D.S.  
President

/s/

Kathleen T. O'Loughlin, D.M.D., M.P.H.  
Executive Director

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