

June 2, 2014

Division of Dockets Management (HFA-305)
Food and Drug Administration
5360 Fishers Lane, Rm. 1061
Rockville, MD 20852

Re: Docket No. FDA-2012-N-1210 – Proposed Rule on Nutrition Facts Labels

To Whom It May Concern:

On behalf of our 157,000 members, we are pleased to comment on the proposed Food and Drug Administration (FDA) rule governing the Nutrition and Supplement Facts Labels for conventional foods and dietary supplements. We offer these comments in response to your Federal Register notice of March 3, 2014 (79 FR 11879).

Eating patterns and food choices play an important role in maintaining good oral health. From a dental perspective, a steady diet of sugary foods and drinks, including juice and sports drinks, can damage teeth. A lack of certain nutrients can also make it more difficult for tissues in the mouth to resist infection.

Added Sugar Content

We are extremely pleased with the proposal requiring that “added sugars” be declared separately from “sugars” as a whole, along with the proposal to include “naturally occurring sugars that are isolated from a whole food and concentrated so that sugar is the primary component (e.g., fruit juice concentrates)” in the definition of “added sugars”.

Both requirements will help consumers monitor their added sugar intake simply by reading a nutrition label. Combined with a strong program of nutrition education, these disclosures will empower consumers to become mouth healthy by being food wise.

Fluoride Content

We take note of your proposal to provide for voluntary declaration of fluoride on Nutrition and Supplement Facts Labels. In fact, the ADA has long supported the mandatory labeling of the fluoride content in bottled water.

Optimal exposure to fluoride is one of the safest and most effective ways to help prevent tooth decay. Unfortunately, consumers who use bottled water as their primary water source often do not realize that the bottling process may actually remove fluoride from the water. The vast majority of bottled waters—especially those treated by reverse osmosis—contain negligible amounts of fluoride or are fluoride-free.

Displaying the fluoride content of bottled water on Nutrition and Supplement Facts Labels will help consumers make informed decisions about their choice of drinking water. Without

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such labeling, individuals who use bottled water as their primary water source could, unknowingly, be missing the decay preventive effects of optimally fluoridated water available from their community water supply.

Oral health is inextricably linked to overall health and well-being. We applaud you for proposing a rule that would help the public monitor their consumption of added sugar in foods and beverages and fluoride in bottled water. Furnishing the public with this information is one more way we can promote lifelong mouth healthy behaviors.

If you have any questions, please contact Mr. Robert J. Burns at 202-789-5176 or burnsr@ada.org.

Sincerely,

/s/

Charles H. Norman, D.D.S.
President

CHN:KTO:rjb

/s/

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