



June 8, 2005

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Rm. 1061
Rockville, MD 20852

RE: Food Labeling; Prominence of Calories
Docket No. 2004N-0463

The Calorie Control Council (the "Council") is an international association of manufacturers of low/reduced calorie, low/reduced fat, and light foods and beverages. Companies making the alternative sweeteners, fat replacers and low-calorie bulking agents for these products are also members of the Council.

Since 1978 the Council has conducted surveys to gauge public opinion on low-calorie foods and beverages. Reduced fat products were introduced into Council surveys in 1991 and the Council began referring to the combined category of low-calorie sugar-free and reduced or low-fat products as "light" foods and beverages. Surveys are designed to show trends from earlier studies. The most recent survey was conducted in 2004. A number of the survey findings are pertinent to the U.S. Food and Drug Administration's advanced notice of proposed rulemaking (ANPRM) concerning the agency's nutrition labeling regulations to give more prominence to calories on food labels.

The Council's 2004 Light Products Usage and Weight Control Habits Survey was conducted via telephone. Qualified respondents were males and females 18 years of age or older. The sample was a national random probability sample and the data were weighted by sex, age and region to produce nationally projectable sample proportions. All interviewing was completed between March 18 and April 4, 2004. Please note the following results:

- 51% of those surveyed agree that they "always try to check the nutrition label for calories"
- 56% agree that they "always check the nutrition label to determine the fat content"
- 57% agree that they "always try to check the list of ingredients"

- 37% reported that the following label would make them more likely to purchase a product: "Using reduced-calorie foods and beverages as part of a diet limited in calories can reduce the risk of obesity"
- 38% reported that the following label would make them more likely to purchase a product: "This food can be useful in weight control"
- 76% agree that "because of the availability of low-calorie, reduced-sugar, and reduced-fat foods and beverages, you can eat a healthy diet and control your weight"

Ninety-two percent report using low-calorie, reduced-sugar, sugar-free and/or low-fat, reduced-fat, or fat-free products. The use of low-calorie, reduced-sugar, sugar-free foods and beverages is reported by 84% while the use of low-fat/reduced-fat and fat-free products is reported by 88%.

- Among those who use low-calorie/reduced-sugar, sugar-free products, most prefer the term sugar-free (33%) followed by low-calorie (30%). Dieters also prefer the term sugar-free (41%).
- Among those who use low-fat/reduced-fat and fat-free products, 31% prefer the term fat-free followed by "light" (24%) and reduced-fat (22%). Dieters also prefer the fat-free term (39%).
- Eighty-five percent of low-calorie, reduced-sugar, sugar-free users would like additional low-calorie products. The majority are interested in additional low-calorie snacks (57%), cakes/pies/baked goods (52%), ice cream/frozen yogurt (51%), and cereals (50%).

One-third of those surveyed report they are currently on a diet, an increase from 24% in previous studies. Fifty-four percent not currently dieting say they are making a serious effort to control their weight. Thirty-five percent of users of either low-calorie, reduced-sugar, sugar-free or low-fat, reduced-fat, or fat-free products are dieting, versus 11 percent of non-users. Females are significantly more likely to be dieting than males (39% versus 27%).

The Council would be pleased to provide additional survey data upon request.

Respectfully submitted,

Lyn O'Brien Nabors

Lyn O'Brien Nabors
Executive Vice President