



April 14, 2017

Jeff Canavan
Deputy Director
Labeling and Program Delivery Staff
Office of Policy and Program Development
Food Safety and Inspection Service
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250-3700

Re: Proposed Rule: Revision of the Nutrition Facts Labels for Meat and Poultry; Products and Updating Certain Reference Amounts Customarily Consumed; Docket No. FSIS-2014-0024

Dear Mr. Canavan:

The American Cancer Society Cancer Action Network (ACS CAN) appreciates the opportunity to comment on the U.S. Department of Agriculture (USDA) Food Safety and Inspection Service (FSIS) proposed rule updating the nutrition labeling requirements for meat and poultry products. We are pleased that USDA is proposing to update the Nutrition Facts label for these products to reflect current scientific research and dietary recommendations and provide consistency in nutrition labeling with foods and beverages regulated by the U.S. Food and Drug Administration (FDA). The American Cancer Society Cancer Action Network (ACS CAN) is the nonprofit, nonpartisan advocacy affiliate organization of the American Cancer Society (the Society) dedicated to eliminating cancer as a major health problem. ACS CAN supports legislative, regulatory, and policy efforts that will make cancer a top national priority.

ACS CAN previously provided comments to FDA on their [proposed rules to update the Nutrition Facts label](#) and [serving size requirements](#) and on their [supplemental proposed rule to update the Nutrition Facts label](#). We strongly [supported](#) FDA's May 2016 final rules to update the Nutrition Facts label and serving size requirements and urge USDA to require similar updates for meat and poultry products. USDA should finalize this proposed rule expeditiously.

Diet and Cancer

Poor diet, physical inactivity, excess weight, and excess alcohol consumption are major risk factors for cancer, second only to tobacco use. In fact, one in five of the estimated 1.7 million cancer cases expected to be diagnosed this year can be attributed to these factors.¹ Excess weight is clearly associated with an increased risk of developing cancers of the female breast (postmenopausal), colon and rectum, uterus, kidney, pancreas, ovary, liver, gastric cardia, gall bladder, and thyroid, and adenocarcinoma of the esophagus, meningioma, and multiple myeloma.² As a result of the clear relationship diet and body weight have with many types of cancer, American Cancer Society guidelines

¹ American Cancer Society. *Cancer Facts & Figures 2017*. Atlanta, GA: American Cancer Society, 2017.

² Lauby-Secretan B, Scoccianti C, Loomis D, et al. Body Fatness and Cancer – Viewpoint of the IARC Working Group. *N Engl J Med* 2016; 375: 8.

for cancer prevention³ and cancer survivorship⁴ recommend eating a healthy diet, with an emphasis on plant foods. Specific dietary recommendations include choosing foods and beverages in amounts that help achieve and maintain a healthy weight, limiting processed meats and red meats, consuming fruits and vegetables and whole grains instead of refined grain products, and limiting alcohol intake for those who drink alcoholic beverages.⁵ Recent research has found that non-smoking adults who followed ACS guidelines for weight control, diet, physical activity, and alcohol consumption lived longer and had a lower risk of dying from cancer and cardiovascular disease.^{6, 7}

There is convincing evidence that diets high in red meat (e.g., beef, pork, lamb) and processed meat (e.g., hot dogs, bacon, sausage, deli meats, etc.) are associated with increased risk of colorectal cancer, according to the World Cancer Research Fund and the American Institute for Cancer Research, whose Continuous Update Project is the world's most comprehensive resource of scientific literature on food, nutrition, physical activity, and cancer.^{8, 9} In addition, the International Agency for Research on Cancer (IARC) has concluded that processed meat is carcinogenic to humans (Group 1), based on sufficient evidence that its consumption causes colorectal cancer.¹⁰ IARC also concluded that red meat is probably carcinogenic to humans (Group 2A).¹¹ Given this research, ACS recommends limiting consumption of red meats and processed meats and instead choosing healthier protein sources, including lean poultry, fish and seafood, nuts and legumes, and other plant-based proteins (e.g., soy). On occasions when red meat is consumed, individuals should choose leaner cuts.

Updating the content and format of the Nutrition Facts label for meat and poultry products to mirror FDA's requirements will help individuals make more informed choices both among meat and poultry options and across protein sources. Providing consumers with access to accurate, science-based information about the nutritional content of food and beverage products facilitates their making healthier diet and lifestyle choices.

Meat and Poultry Products Required to Have the Updated Nutrition Facts Label

We support requiring updates to the Nutrition Facts label for all meat and poultry products intended for sale to consumers, with limited exemptions. All multi-ingredient, heat-processed meat and poultry products; ground or chopped meat and poultry products; and single-ingredient raw meat and poultry products should be subject to the regulations. We do not support exempting single-ingredient raw meat

³ Kushi LH, Doyle C, McCullough M, et al. American Cancer Society Guidelines on Nutrition and Physical Activity for Cancer Prevention. *CA Cancer J Clin* 2012; 62:30-67.

⁴ Rock CL, Doyle C, Demark-Wahnefried W, et al. Nutrition and Physical Activity Guidelines for Cancer Survivors. *CA Cancer J Clin* 2012; doi: 10.3322/caac.21142.

⁵ Kushi, 2012.

⁶ Kohler LN, Garcia DO, and Harris RB. Adherence to Diet and Physical Activity Cancer Prevention Guidelines and Cancer Outcomes: A Systematic Review. *Cancer Epidemiol Biomarkers Prev* 2016; 25(7): 1018-28.

⁷ McCullough ML, Patel AV, Kushi LH, et al. Following Cancer Prevention Guidelines Reduces Risk of Cancer, Cardiovascular Disease, and All-Cause Mortality. *Cancer Epidemiol Biomarkers Prev* 2011; 20(6): 1089-97.

⁸ World Cancer Research Fund (WCRF) and American Institute for Cancer Research (AICR). *Food, Nutrition, and the Prevention of Cancer: A Global Perspective*. Washington, DC: AICR, 2007.

⁹ WCRF and AICR. *Colorectal Cancer 2011 Continuous Update Project Report*. 2011. Available at http://www.dietandcancerreport.org/cancer_resource_center/downloads/cu/Colorectal-Cancer-2011-Report.pdf.

¹⁰ Bouvard V, Loomis D, Guyton KZ, et al, on behalf of the International Agency for Research on Cancer Monograph Working Group. Carcinogenicity of consumption of red and processed meat. *The Lancet Oncology* 2015; 16(16): 1599-1600.

¹¹ Ibid.

and poultry products that are not major cuts, such as chicken nuggets, beef ribs, and flank steak,¹² from being required to have an up-to-date Nutrition Facts label. It is important for people to have nutrition information that will allow them to make more informed purchase and consumption decisions across meat and poultry products.

Specific Updates to the Nutrition Facts Label Format

We support updating the format requirements for the Nutrition Facts label to make it easier to use and to more effectively guide people towards healthier options.

Calories and Serving Size

We support making the calorie and servings per container information larger and more prominent, as calories are the most relevant information for people to use in managing weight. The *2015-2020 Dietary Guidelines for Americans* recommends following a “healthy eating pattern *at an appropriate calorie level* to help achieve and maintain a healthy body weight”.¹³

We also recommend making the serving *size* information larger, more prominent, and in common household measures. Calorie information is only useful if consumers understand the amount of food or beverage that contains the specified number of calories and nutrient amounts. As the proposed rule notes, an FDA analysis of recent research found that people often do not correctly calculate the number of calories and other nutrients they consume because they misrepresent the serving size and do not multiply the nutrient values per serving by the number of servings per container.

Single Serving Packages

We support USDA’s proposal to require that packages with between 150 and 200 percent of the reference amount customarily consumed (RACC) be labeled as a single serving. This proposed change is consistent with FDA’s requirements and the fact that these foods are often eaten by one person in one sitting.

Dual Column Labeling

Consistent with FDA’s requirements, we also support USDA’s proposal to require dual column labeling for products that contain between two and three times the RACC. Given that these products are sometimes consumed by one person in one sitting and sometimes by multiple people or at multiple times, dual column labeling will help people understand how many calories and nutrients they will consume if they eat or drink a single serving, *or* the entire container, without requiring them to do any calculations.

Specific Updates to the Nutrition Facts Label Content

We support most of the proposed updates to the nutrient disclosure requirements for meat and poultry products.

Added Sugars

¹² USDA, FSIS. Nutrition Labeling of Single-Ingredient Products and Ground of Chopped Meat and Poultry Products. Available at https://www.fsis.usda.gov/wps/wcm/connect/7ba62a63-64a6-4fda-a709-6d71d0b339c4/Nutrition_Labeling_Overview.pdf?MOD=AJPERES. Accessed April 5, 2017.

¹³ U.S. Department of Health and Human Services and USDA. *Dietary Guidelines for Americans, 2015-2020*. Available at <https://health.gov/dietaryguidelines/2015/guidelines/>. Accessed April 3, 2017.

We strongly support the proposed inclusion of added sugars content and a Daily Value for added sugars to the Nutrition Facts label. Added sugars provide excess calories without any nutritional benefits. On average, Americans consume about 270 calories per day from added sugars, more than 13 percent of total calories.¹⁴ The Dietary Guidelines recommend limiting added sugars to less than 10 percent of calories per day. Therefore, and consistent with FDA's final rule, we support establishing a daily value for added sugars based on a dietary reference value (DRV) of 50 grams per day. Consumer education is needed to help people understand that 10 percent of calories from added sugar should be considered a daily limit, rather than a target amount.

Nutrients of Public Health Concern

We are pleased that USDA has proposed to require mandatory declaration on the Nutrition Facts label of the "nutrients of public health concern"¹⁵ in the Dietary Guidelines: fiber, calcium, vitamin D, potassium, and for certain populations, iron. These nutrients are underconsumed by most Americans, and their low intakes are associated with health concerns. We also support making the declaration optional for other micronutrients (except for sodium) that do not rise to that level of concern.

Other Nutrients

We also support most of the other proposed changes to the nutrient disclosure requirements. We support removing the declaration of calories from fat; however, total fat, saturated fat, trans fat, and sodium should continue to be disclosed. The Dietary Guidelines recommend making shifts among protein foods to increase variety and make more nutrient-dense choices. According to the Dietary Guidelines, commonly consumed protein foods include beef, chicken, pork, and processed meats. About half of these foods are consumed by themselves (i.e., a chicken breast, a steak), and about half are consumed as part of a mixed dish (i.e., burger, sandwich, taco).¹⁶ Some meat and poultry foods and mixed dishes with these ingredients are high in fats, sodium, and added sugars. Therefore, it is important for people to have information about the content of these nutrients to allow them to make the most nutrient-dense choices.

Consumer Education and Implementation

The updates to the Nutrition Facts panel for meat and poultry products complement other nutrition labeling strategies, including the updates to the Nutrition Facts Label for FDA-regulated products, the menu labeling requirements for chain restaurants and other food retailers, and the calorie labeling requirements for chain vending machines. Some of these complementary nutrition labeling strategies have already taken effect or will be in place soon. Consumer education will be needed to help people understand and use the new Nutrition Facts panel to make healthier food and beverage choices. USDA should work with other federal agencies and private partners to help the industry comply with the new labeling requirements and help to ensure that people notice the changes to the label, understand how to use the new information, and make use of it in food purchase and consumption decisions.

USDA should finalize these regulations as quickly as possible. Ideally, the compliance date for these regulations should be the same as that for the Nutrition Facts label updates for FDA-regulated products: July 26, 2018. However, if it is not possible to implement these regulations by July 2018, the implementation date for updates to the Nutrition Facts label for FDA-regulated food and beverage products should not be delayed to coordinate with this regulation.

¹⁴ Ibid.

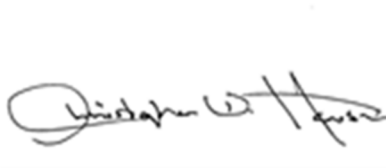
¹⁵ Ibid.

¹⁶ Ibid.

Conclusion

Thank you for considering our comments. If you have any questions or we can provide any additional information, please contact Melissa Maitin-Shepard, Senior Analyst, Policy Analysis & Legislative Support, at melissa.maitin-shepard@cancer.org or 202-585-3205.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher W. Hansen", enclosed within a thin black rectangular border.

Christopher W. Hansen
President
American Cancer Society Cancer Action Network