CENTER FOR
Science IN THE
Public Interest
The nonprofit publisher of
Nutrition Action Healthletter

October 13, 2015

Dr. Stephen Ostroff, M.D.
Acting Commissioner
Division of Dockets Management
Food and Drug Administration
5630 Fishers Lane
Room 1061, HFA-305
Rockville, MD 20852

Re: Comment on Food Labeling: Revision of the Nutrition and Supplement Facts Labels; Supplemental Proposed Rule to Solicit Comment on Limited Additional Provisions, Docket No. FDA-2012-N-1210

Dear Acting Commissioner:

The Center for Science in the Public Interest strongly supports the Food and Drug Administration's (FDA) supplemental proposal to revise the Nutrition and Supplements Facts labels by setting a Daily Value (DV) for added sugars, adding a percent DV for added sugars, and other additional changes to its 2014 proposal. We also make other recommendations below. This comment supplements, but does not replace, CSPI's earlier comment to the 2014 docket concerning the Nutrition Facts Panel (NFP).

1. **The agency appropriately relies upon information from the 2015 Dietary Guidelines Advisory Committee report, as well as the robust science upon which that report is based, and on other sources regarding the demonstrated health risks of added sugars.**

In 2014, FDA proposed that the Nutrition Facts label should declare the amount of added sugars in foods to help consumers who would like to adhere to dietary recommendations to limit added sugars as part of maintaining a healthy diet. Currently, the Nutrition Facts Panel (NFP) lacks information about added sugars, which is an omission of key public health importance given the prevalence of cardiovascular disease, obesity, type 2 diabetes, and tooth decay in the United States linked to such sugars in the diet. As the 2015 Dietary Guidelines Advisory Committee (DGAC) report states:

> The U.S. population should be encouraged and guided to consume dietary patterns that are rich in vegetables, fruit, whole grains, seafood, legumes, and nuts; moderate in low- and non-fat dairy products and alcohol (among adults); lower in red and processed meat; and low in sugar-sweetened foods and beverages and refined grains."[1] (*Emphasis added.*)

The DGAC's recommendation is also consistent with recent guidelines from the American Heart Association (AHA) and the American College of Cardiology.[2] The healthy dietary pattern

identified was based on evidence that received the highest possible grades for certainty and benefit.[3]

Steps to isolate harms from added sugars by labeling them are also grounded in reason: while both naturally occurring and added sugars are chemically identical, naturally occurring sugars are present in fruits, vegetables, and dairy products—foods that are key components of the recommended dietary pattern. There is no evidence that sugars in whole fruits and vegetables and dairy products increase the risk of chronic disease; the risk has been solely from sugars added to foods. It is therefore critical for public health that the NFP distinguish naturally occurring sugars from added sugars.

Furthermore, the DGAC comprehensively reviewed the current scientific literature and concluded that added sugars increase the risk of multiple adverse health outcomes, including excess body weight, type 2 diabetes, cardiovascular disease, and dental caries.[4] That evidence, all of which was graded either as "strong" or "moderate" by the DGAC, applying the Nutrition Evidence Library grading rubric, further supports mandatory declaration of added sugars on the NFP and, as the Committee noted, supports addition of a percent DV for added sugars on the label as well. We discuss this evidence in more detail below.

We note that while FDA's supplemental proposal cites evidence linking excess added sugars to cardiovascular disease in particular, the evidence linking added sugars to additional serious adverse health outcomes and conditions, including obesity, diabetes, and dental caries, is robust. Strong evidence supports the link between added sugars to these health outcomes because:

- prospective cohort studies consistently report a higher risk of cardiovascular disease, weight gain, type 2 diabetes, and dental caries in people who consume more added sugar or sugar-sweetened beverages, which account for nearly half of the added sugars in the average American's diet;
- clinical trials demonstrate that sucrose, high-fructose corn syrup, or fructose (which occurs only in sugars) raise levels of triglycerides, LDL cholesterol, visceral fat, liver fat, uric acid, and other risk factors for these diseases; and
- the healthy dietary patterns recommended by health authorities leave little room for sugar-sweetened foods and beverages at the levels of sugar common in foods and beverages today.

These additional, important adverse outcomes—including obesity, diabetes, and dental caries—should be added to the evidence on which FDA explicitly relies in its final rule. Doing so would make clear the full public health benefits that result from adding a percent DV for added sugars on food and beverage labels. To assist the agency in so doing, the sections below present this evidence in some depth.

Added Sugars Are Linked to Risk of Cardiovascular Disease in Adults and Adolescents

First, we concur with FDA's proposal that added sugar consumption is linked to cardiovascular disease. As the agency proposes, the DGAC's systematic review of evidence concluded that added sugars, especially in the form of sugar-sweetened beverages, are consistently associated with increased risk of hypertension, stroke, and coronary heart disease in adults.[5]

For example, a recent prospective study of more than 11,000 people in the National Health and Nutrition Examination Survey (NHANES) III—a nationally representative sample of Americans—showed a positive, dose-response association between added sugars consumption and cardiovascular mortality. Individuals who consumed 10 to 24.9 percent of their calories from added sugars had a 30 percent higher risk of dying from a heart attack, stroke, or other cardiovascular event than those who consumed less than 10 percent of their calories from sugars. This risk *tripled* for those who consumed 25 percent or more of their calories from added sugars.[6]

In addition, regularly consuming sugar-sweetened beverages is associated with an increased risk of coronary heart disease and stroke, independent from other risk factors for cardiovascular disease.[7] Clinical studies report that added sugars increase the risk factors for cardiovascular disease, including serum triglycerides, LDL cholesterol, and blood pressure.[8] Additional studies point to the fructose component of added sugars as responsible for increases in triglycerides and LDL cholesterol.[9]

Moreover, studies find that higher added-sugars intake is associated with dyslipidemia (typically high triglycerides and LDL ("bad") cholesterol or low HDL ("good") cholesterol) in adults and adolescents.[10] In these studies, among overweight adolescents, added sugars are also associated with greater insulin resistance. These conditions are risk factors for developing cardiovascular disease. Counter-measures to address risks in this young, vulnerable population with years ahead of them should be a particular emphasis as FDA seeks to address the staggering social, personal and medical costs of childhood and adolescent obesity and dietary disease, including type 2 diabetes.

Last, the DGAC based its findings on its comprehensive review of dietary patterns, concluding that a dietary pattern that lowers blood pressure and is associated with a lower risk of cardiovascular disease is low in added sugars.[11] FDA should also consider the strong associations in the literature between added sugars consumption and other health risks, as we explain below.

Added Sugars Are Linked to the Risk of Obesity

Added-sugars consumption, particularly from sugar-sweetened beverages, is associated with increased risk of weight gain and obesity. The DGAC concluded that there is *strong* evidence that the intake of added sugars from food and/or sugar-sweetened beverages is associated with excess body weight in children and adults.[12] The AHA also concluded in its 2009 Scientific Statement that high intake of sugars is associated with an increased risk of higher body weight.[13]

In support of that conclusion, two recent reviews of clinical trials and cohort studies of both adults and children concluded that intake of added sugars and/or sugar-sweetened beverages is associated with weight gain.[14] For example, a large, double-blind, placebo-controlled randomized clinical trial demonstrated that children aged 4 to 11 who were given 8 oz. a day of a sugar-sweetened beverage gained significantly more weight and body fat over 18 months than those given a sugar-free beverage.[15]

Added Sugars Are Linked to the Risk of Type 2 Diabetes, Independent of Body Weight

The risk of developing type 2 diabetes has been convincingly linked to consumption of added sugars, and particularly of sugar-sweetened beverages. Specifically, the 2015 DGAC concluded that sugar-sweetened beverages are associated with an increased risk of type 2 diabetes both by promoting weight gain and in *a relationship that is not dependent upon body weight*. In the seventeen articles reviewed by the DGAC, increased consumption of sugar-sweetened beverages was "consistently associated with increased risk of type 2 diabetes," even after adjusting for body mass index (BMI).

One meta-analysis (reviewed by the DGAC) reported that people who consumed the most sugar-sweetened beverages (typically, 1 to 2 servings a day) had a 26 percent higher risk of developing type 2 diabetes than those who consumed the least (less than one serving per month) and that relationship existed even after adjusting for BMI.[16]

Added Sugars Are Linked to Development of Dental Caries

High intake of added sugars, particularly consumption of sugar-sweetened beverages, is consistently associated with an increased risk of dental caries and tooth decay. Based on a World Health Organization (WHO)-commissioned review of the scientific evidence, researchers concluded that there is consistent evidence supporting the relationship between sugar-sweetened beverages and dental caries.[17] A review by Gutpa, *et al.*, found that there was a strong correlation between the amount of added sugars and the frequency of intake, both of which contributed to the development of dental caries.[18] The researchers also noted that products contain "hidden sugars" not obvious to consumers that contribute to intake.[19]

An added-sugars line on the NFP would be an important source of information for consumers trying to reduce the risk of developing cavities. The American Dental Association supported an added-sugars line on the NFP and stated that consistent evidence associates high added-sugars intake with dental caries in its comment to the DGAC 2015.

2. Ample scientific research provides a basis for establishing a Daily Reference Value (DRV) for added sugars and for requiring the declaration of a percent DV on labels to increase consumer understanding of added sugars in foods.

Recent Compelling Consumer Research Demonstrates a Public Preference for a Labeling of Added Sugars and FDA Should Also Consider Adding Juice Sugars to the Line for Added Sugars

Research demonstrates clear links between added sugars and obesity, type 2 diabetes, cardiovascular disease, and dental caries, and the addition of an added-sugars line would empower consumers to make more informed decisions. In 2014, the Center for Science in the Public Interest (CSPI) commissioned an Internet-based survey (so that various labels could be shown to participants) to assess consumer preference for various NFPs. When asked which label was preferred to make healthier decisions, *80 percent* of respondents selected the NFP with an added-sugars line in lieu of the current NFP.[20]

Under FDA's prior proposal, fruit juice concentrates would be considered added sugars. Like soft drinks, fruit and vegetable juices contain sugars without the beneficial fiber and cell structure of fruits and vegetables in their intact, solid form. Therefore, the classification of fruit juice concentrates as added sugars should be extended to include the naturally occurring sugars in fruit and vegetable juices. Although fruit juices typically contain more nutrients than added sugars, juice sugars appear to behave in the body like added sugars. For instance, the

consumption of fruit juice has been associated with a higher risk of weight gain and type 2 diabetes.[21]

Therefore, the additional line identifying "Added sugars" should be expanded to "Added Sugars & Juice Sugars," which would include the sugars in fruit and vegetable juices. That would be consistent with the World Health Organization's definition of "free sugars:"

> Monosaccharides (such as glucose, fructose) and disaccharides (such as sucrose or table sugar) added to foods and drinks by the manufacturer, cook or consumer, and sugars naturally present in honey, syrups, fruit juices, and fruit juice concentrates.[22]

Extending the concept of added sugars to include fruit and vegetable juices would prevent consumers from selecting juices as a "healthful" substitute for sugar-sweetened drinks. It would also make manufacturers less likely to replace high-fructose corn syrup (or similar added sugars) in processed foods with juice sugars, and the NFP would enable consumers to identify the sugars in their foods that may pose a health risk.

Regardless of what the agency decides on this question, we note that their proposal to include added sugars on the label is on solid legal ground. While there is some evidence, as above, regarding the risks of excess sugars in the form of juice sugars, the weight of the evidence regarding health harms concerns the documented adverse impacts of SSBs—and added sugars from sources other than fruit juice—in the diet.

In addition, to aid consumer understanding, the agency could consider options for labeling that specifically names other forms of sugar that occur naturally in foods. This would explain the gap between the Total Sugars line and the "Added Sugars and Juice Sugars" or Added Sugars line for alert consumers, and further the public's understanding of nutrition principles that are relevant to health. When 500 participants in CSPI's 2014 online survey were shown the FDA's proposed label (showing "Sugars" and "Added sugars") and asked, "How much naturally occurring sugar, such as from fruit or milk, does one serving of this food contain?" only 28 percent answered correctly. Almost half of participants incorrectly reported the number of grams on the "Sugars" line (which represent the amount of total sugars). However, when another 500 adults were shown an equivalent Nutrition Facts label in which the "Sugars" line was replaced by a line listing "Fruit & Milk Sugars," 77 percent of people correctly identified the amount of naturally occurring sugars in one serving of the food.

A percent DV for added sugars is warranted by the evidence and would benefit consumers

A percent DV would provide much-needed context for consumers regarding the amount of added sugars in a serving of food. FDA noted in its 2014 proposal the public health purpose of including a percent DV on food and beverage labels:

> In particular, the percent DV of a nutrient present in food is declared on food labels to help consumers understand the relative significance of nutrition information in the context of a total daily diet, compare the nutritional values of food products, and to plan general diets. We also noted that the percent DV information advises the consumer how much of a recommended intake of that nutrient is provided by the food. *See* 79 F.R. 11880, 11887. (*Citations omitted.*)

As the agency also made clear in 2014, its rationale for including added sugars on the label is grounded in FDA's concern for overall dietary health and its goal of assisting consumers in making health-minded dietary decisions:

> [O]ur review is based on the need for nutrient information for consumers to implement key dietary recommendations to assist consumers to maintain healthy dietary practices and the need for consumers to be able to readily observe and comprehend the information and to understand its relative significance in the context of a total daily diet. *See id.*

In the absence of a percent DV, consumers could compare only the relative amounts of added sugars among products but would not know how much of a day's worth of added sugars a specific food or beverage contains.

This is problematic, as it omits key information consumers should have to compare the healthfulness of products. When a 2014 online survey commissioned by CSPI (conducted among a demographically representative U.S. sample of 1,045 adults) showed 500 people an NFP with added sugars listed only in gram amounts, 78 percent of people said they either did not know how much of their recommended daily limit of added sugars was in one serving of the food or could not tell the amount from the label.[23] However, when a percent DV was added to the label, 66 percent answered correctly (*see* Appendix 1).

A survey sponsored in 2015 by CSPI found additional evidence that consumers view percent-DVs as being very helpful for health.[24] The survey asked 1,011 consumers whether including a percent-DV for sugars would help them figure out how many servings of a high-sugar soft drink or muffin fit into a healthy daily diet. For the soft drink, consumers reviewed two identical labels, one with and one without a percent DV for sugars. A stunning 80 percent of consumers identified the label including the percent DV as the one that would "make it easier" for them "to determine whether drinking one bottle would fit intoa healthy daily diet." The responses to the same question (with the label order switched) for the muffin were similar: 84 percent of respondents identified the label with the DV as more helpful.

CSPI's results are consistent with other evidence. In a recent study, fewer than five percent of participants were able to correctly identify the recommended limit for total sugar intake, and fewer than 10 percent were able to correctly identify the recommended limit for added sugar.[25] The study also tested interpretation of six distinct NFPs. Substantially more people correctly identified the amount of sugar expressed in an NFP when sugar was presented in grams, teaspoons, *and* as percent DV than when sugar was listed only in grams. Individuals viewing labels that included total sugar (expressed in grams) and added sugar (expressed in grams and as percent DV) were more likely to recognize a product had "a lot" of added sugar than those who viewed a label with added sugars expressed only in grams or one that listed only total sugars. Commentary on the study highlighted its relevance for FDA's proposal and the benefit this information provides for consumers.[26]

Since FDA's 2014 proposal, evidence in support of including a percent DV has only increased, and we urge the agency to adopt 10 percent of total energy intake as the DV for added sugars, as was proposed in the supplemental notice. The 2015 DGAC concluded that added-sugars intake should be below 10 percent of total energy intake on the basis that high levels of

added sugars increase the risk of type 2 diabetes and excess body weight.[27] Based on this strong conclusion, the DGAC report states that "the Nutrition Facts label should include a percent daily value, to assist customers in making informed dietary decisions by identifying the amount of added sugars in foods and beverages."[28]

Furthermore, that conclusion is consistent with the WHO's March 2015 recommendation that "free sugars" (which includes added sugars and the naturally occurring sugars in fruit juices) be less than 10% of total energy intake.[29] Dr. Franceso Branca, director of WHO's Department of Nutrition for Health and Development, said that "[w]e have solid evidence that keeping intake of free sugars to less than 10 percent of total energy intake reduces the risk of overweight, obesity, and tooth decay."[30] In addition, numerous other prominent health organizations, including the American Heart Association and the American Diabetes Association, suggest that individuals reduce added sugars in their diets (s*ee* Appendix 3).

While we support the DGAC's recommendation for consuming no more than 10 percent of calories from added sugars, and believe that the recommendation could form an adequate basis for FDA to include a percent DV for added sugars on the labels of packaged foods, we believe that a lower recommendation would also be appropriate. Specifically, Americans should get no more than five to ten percent of their calories from added sugars, aligning FDA's standards with recommendations from the American Heart Association. We note as well that the 2,000-calorie "Healthy U.S.-Style," "Healthy Mediterranean-Style," and "Healthy Vegetarian" dietary patterns developed for the DGAC report included only 6 or 7 percent of calories from added sugars.[31]

FDA should change its added sugars recommendations to 25g or less of added sugar for 1- to 11- year-olds and 50g or less of added sugars for children 12 years and older

The DGAC recommended that added sugar be limited to a maximum of 10 percent of total calories based on a food pattern modeling analysis and the committee's review of the evidence. FDA used that recommendation to "determine a DRV of 50 g first by multiplying the 2,000 reference calorie intake by 10 percent (2,000 x .10 = 200 calories)… Dividing 200 calories by 4 calories/g (200 ÷ 4 calories/g = 50 g)."[32] As FDA explains, "[t]he 2,000 calorie value represents a reference intake for adults and *children 4 years* of age and older."[33] [*Emphasis added*.]

Problematically, however, that would extend the added-sugars recommendations that are appropriate to adults consuming a 2,000 calorie diet to 4-year-olds. Yet those children, according to the U.S. Department of Agriculture, should be consuming about 1,400 calories per day, assuming moderate activity.[34] Thus, under FDA's current recommendations, a 4-year-old could consume more than 14 percent of calories from added sugars and still be within the guidelines. This disparity does not align with the DGAC's recommendations or current caloric guidelines for children by age (*see* Appendix 4). It also is inconsistent with the WHO's recommendations for free sugars, accounting for less than 10 percent of total calories, until age 11 for boys and age 12 for girls.

We therefore propose that the FDA change its DRV in the calculation cited above to 25g of added sugars or less for children aged 1 to 11 years and 50g of added sugar or less for 12-

year-olds and older adolescents and teens. This proposed change would bring the FDA's recommendations more in line with its stated goal of consuming less than 10 percent of total calories from added sugars, a goal of particular salience for children, who are vulnerable to excessive sugar in their dietary offerings and who are currently facing a startling and unprecedented risk of developing dietary-related diseases linked to sugar, including type 2 diabetes. For products marketed to children between the age of 1 and 11 years old, FDA should require listing of this alternative information for added sugars and other nutrients.

These products could be identified by manufacturers because they qualify for FDA's definition by meeting one or more of the following criteria: they include cartoon characters or other promotions designed to appeal to children, because: they use shapes (fish, stars, etc.) designed to appeal to children; they are marketed or promoted on children's media, or they are marketed or appeal to children according to other criteria FDA determines are reasonable, including based on information from consumer surveys and NHANES data.[35] For products commonly consumed by *both* children and adults, such as many breakfast cereals and crackers, food manufacturers should be expressly permitted by FDA to voluntarily provide the information specific to both adults and children for calories levels and nutrients on the NFP.

FDA should require added sugars on the NFPs to be expressed in teaspoons as well as in grams

Few Americans are familiar or facile with the metric measure (grams) used for total sugars, but virtually everyone understands standard household measures (as are used on labels for serving sizes and in recipes). Therefore, for reasons similar to those provided by FDA in the original proposal stating that serving sizes should be listed in household measures (*i.e.*, teaspoons, tablespoons, cups), and grams, milliliters, or liters,[36] we *strongly* urge FDA to require added sugars be listed in teaspoons as well as grams. This would support efforts to make food labels more understandable to people with poorer literacy and numeracy skills or less understanding of nutrition.

A 2010 national telephone survey commissioned by CSPI found that 72 percent of respondents favored listing teaspoons of added sugars on the label (38 percent preferred listing only teaspoons, while 34 percent preferred both teaspoons and grams). Just 20 percent of those polled preferred listing sugar amounts in grams only.[37] CSPI's Internet-based 2015 survey[38] (included in Appendix 2) was also instructive, showing that:

1) **Consumers simply don't understand grams**. *Only 18 percent of consumers correctly identified the number of grams of sugar in one teaspoon*, while 53 percent indicated outright that they "didn't know" the amount. Of those who thought they did know, 62 percent were incorrect.

2) **Consumers cannot convert grams into the more familiar measurement of teaspoons.** When informed that a beverage contained 40 grams of sugar per serving, and asked to convert the number to teaspoons of sugar, *40 percent of consumers indicated they did not know the answer, and only about 25 percent came within five teaspoons of the correct answer*—9½ teaspoons.

3) **Consumers prefer measurements in teaspoons.** Respondents were shown two nutrition labels, one with sugars expressed only as grams, the other only as teaspoons. When asked which label "more clearly conveys to you the amount of sugar in a 20-ounce bottle," *61 percent*

of respondents preferred teaspoons while only 28 percent preferred the current measurement of grams. A second question asked consumers to review three labels with differences in the line for sugars, showing: grams alone, teaspoons alone, and both teaspoons and grams. *A majority—61 percent—preferred grams and teaspoons together, while 18 percent wanted only teaspoons and 14 percent only grams*. In sum, 79 percent identified a desire for measurements in teaspoons (with or without grams), while a mere 14 percent preferred grams alone.

Because it would improve the clarity of the information provided about added sugars, listing the amount of added sugars in both teaspoons and grams is essential and consistent with FDA's purpose for including the line for added sugars on the NFP, which was, as noted above, "based on the need for consumers to be able to readily observe and comprehend the information on sugars and to understand its relative significance in the context of a total daily diet."[39] FDA's final rule would be arbitrary and capricious if it fails to reflect this considerable evidence that expressing added sugars both in terms of teaspoons and in grams would be helpful to consumers and further its mission.

3. FDA should require use of the term "Total Sugars" on the NFP or should replace "Total Sugars" with a line for naturally occurring sugars that are not in juice form.

Consumer research by FDA indicates that replacing the term "Sugars" with the term "Total Sugars," rather than "Sugars," on the label would enhance consumers' ability to compare the overall nutritional values of foods. FDA's Added Sugars Experiment is cited in the proposed rule and included in the Docket as Ref. 1, and shows better consumer comprehension using a "Total Sugars + Added Sugars" format than simply an "Sugars + Added Sugars" format.

If the agency uses "Total Sugars," we suggest that FDA identify a way to place "Total Sugars" on the label in a way that simultaneously ensures a clear connection between "Total Sugars" and "Added Sugars" (or "Added Sugars & Juice Sugars," as we suggest above), such as the use of an indent, to increase the likelihood that people would understand that the Added Sugars are *not* added *to* "Total Sugars." In addition, we note that use of the heading "Total Sugars" is consistent with the manner in which the Nutrition Facts panel lists "Total Carbs" and "Total Fat."

However, a line for "Total Sugars" may not be the best use of labeling space, given that most consumers lack understanding of the types of sugars that occur in foods and beverages. We agree with the 2015 Dietary Guidelines Advisory Committee (DGAC) that "food and calorie label education should be designed to be understood by audiences with low health literacy, some of which may have additional English language fluency limitations."[40] Thus, as we recommend above, under the line for "Total Sugars" could be a line for "Fruit [or Vegetable] & Milk Sugars" (as appropriate for a particular food or beverage) and for "Added Sugars & Juice Sugars," to aid consumer understanding. Alternatively, FDA could test just two lines, dropping the line for Total Sugars altogether and substituting the Fruit/Vegetable/Milk Sugars line for it, with "Added Sugars and Juice Sugars" listed below it without any indentation.

4. We support FDA's proposals for changes to the footnote text and urge the agency to conduct comprehensive consumer education to enhance public understanding.

Overall, we support the need to update proposed text for the footnote on the Nutrition Facts label. The current footnote contains outdated information about nutrient needs and fails to clearly explain the meaning of the term "percent DV."

We are pleased that FDA has conducted consumer research to assess whether modifications to the footnote area and changes to the text affect consumers' interpretation of the Nutrition Facts labels. FDA's research ("Experimental Study on Consumer Responses to Nutrition Facts Labels with Various Formats") found that consumers rated all of the revised footnotes as easier to understand than the current footnote. This strongly supports a need to update the current footnote to make it simpler and easier for consumers to understand.

FDA's study also found that none of the footnotes that were tested had a statistically significant effect on how participants evaluated the product based on its Nutrition Facts label. According to the supplemental proposal, the footnote option that was chosen,[*] a modified version of Footnote 1, was proposed because study participants found it to be more believable than the other footnote options. However, both Footnotes 1 and 2 were perceived to be slightly more useful and Footnote 2 was perceived as slightly more helpful than the current proposed footnote.

Given these equivocal findings, we suggest that FDA give additional consideration to Footnote 5, as this formulation offers real value for consumers seeking more information on nutrients in the diet that should be reduced, and scored well with consumers. We suggest that FDA consider the results of any additional consumer research on the use of nutrition information and nutrition education resources in making its final decision about which statement to choose, and that it further investigate the value of Footnote 5.

We strongly support FDA's proposal that the footnote contain both a definition of Daily Value and a reference calorie level. We are pleased that the proposed footnote would include the word "Daily Value," instead of just the abbreviation "DV," and concur that 2,000 calories is the appropriate reference level for most foods because it is the basis of the percent DVs for many nutrients and approximates the calorie needs for many adults.

These changes to the footnote do not obviate the need for FDA to conduct consumer education regarding label changes. We recommend that FDA conduct a comprehensive consumer education campaign when the new Nutrition Facts label appears on food labels. A well-funded, coordinated, multi-component consumer education campaign to promote and explain the new Nutrition Facts label is necessary to help consumers understand the information provided by the label and how they could use it to make healthier food and beverage choices. Such a campaign should involve nonprofit health and consumer organizations, the food industry, health professionals, the media, and others.

According to research cited in the preamble to the proposed rule, approximately 40 to 55 percent of Americans regularly use the Nutrition Facts label when purchasing food. That percentage varies significantly by demographic group. Additional education about the meaning

[*] The proposed footnote for the new nutrition facts label is: "The % Daily Value tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice."

of the footnote and how to understand and use the information on the label is needed in order for it be an effective tool in helping consumers make better choices.

5. We do not support the proposed footnote exemptions.

We do not support the proposal to allow footnote exclusion if a food qualifies to use the terms "calorie free," "free of calories," "no calories," "zero calories," "without calories," "trivial source of calories," "negligible source of calories," or "dietary insignificant source of calories." Although these products have little to no impact on calorie intake, which the second part of the footnote addresses, they may contain a significant percentage of the DVs of other nutrients, most notably sodium or vitamins.

For calorie-free food products supplying other nutrients that are listed on the NFP, the first part of the proposed footnote, "The % Daily Value tells you how much a nutrient in a serving of a food contributes to a daily diet" should be included. The Nutrition Facts label on calorie-free foods containing nutrients currently includes the footnote "*Percent Daily Values are based on a 2,000 calorie diet." We believe that the first sentence of the proposed footnote, "The % Daily Value tells you how much a nutrient in a serving of food contributes to a daily diet," provides consumers with information that would help consumers understand the vitamin and mineral content of these calorie-free foods.

For example, non-caloric salad dressings, diet and electrolyte beverages, fortified waters, and energy drinks may contain significant amounts of vitamins and minerals. Drinks frequently contain added sodium, potassium, B vitamins, and vitamin C. They may also contain vitamin A, vitamin E, calcium, folate, vitamin D, magnesium, or phosphorus. These nutrients can supply 100% of the DV in a serving. We urge the FDA to require inclusion of the first sentence of the proposed footnote on all foods bearing a Nutrition Facts label.

6. FDA should require modifications and corresponding labeling changes to the footnote on products specifically intended for infants 7 through 12 Months of Age and children 1 through 3 years.

To provide parents and caregivers with useful nutrition information, the footnote on both foods and dietary supplements should be modified on any products specifically intended for consumption by infants 7 through 12 months of age and children 1 through 3 years of age. Many products intended for young children today lack a footnote with the calorie level on which their percent-DVs are based. (*See* Figure 1). These food labels should include an asterisk with a footnote indicating the number of calories on which they have based these calculations, as FDA proposes for dietary supplements for infants in the proposed rule text.

Nutrition Facts

Serving Size: 16 pieces (7g)
Servings Per Container About 6

Amount Per Serving

Calories 35	Calories from Fat 15
Total Fat	2g
Saturated Fat	0g
Trans Fat	0g
Cholesterol	0mg
Sodium	50mg
Potassium	15mg
Total Carbohydrate	4g
Dietary Fiber	0g
Sugars	0g
Protein	0g

% Daily Value	Infants <1	Children 1–4
Protein	0%	0%
Vitamin A	0%	0%
Vitamin C	0%	0%
Calcium	6%	4%
Iron	10%	15%
Vitamin E	20%	10%
Zinc	15%	10%

Figure 1 Gerber Graduates lil' Crunchies Veggie Dip: While there is a distinct DV for different age groups in the lower-half of the NFP, the number of calories on which the DV is calculated is not made available.

In addition, FDA should require that products for children of different ages include an appropriate percent DV for their caloric needs. As some companies already voluntarily include percent DV for different age groups on the same NFP, it is clear that providing such information is technically feasible. (*See* Figure 1). All of the foods and dietary supplements intended for infants who are 7 months through 12 months of age and children 1 through 3 years of age should be required to include percent DVs for each age group.

In addition to this common sense step, FDA should consider, as suggested above, requiring companies to list appropriate DVs for all foods in a prominent online location by age group. This would allow parents and others interested in nutrition to look up their own commonly consumed foods and to glean appropriate nutrition information on such foods and beverages.

[1] Dietary Guidelines Advisory Committee (DGAC). Scientific Report of the 2015 Dietary Guidelines Advisory Committee. 2015; p. 4. Available at http://www.health.gov/dietaryguidelines/2015-scientific-report/PDFs/Scientific-Report-of-the-2015-Dietary-Guidelines-Advisory-Committee.pdf. Accessed May 8, 2015.

[2] Eckel RH, Jakicic JM, Ard JD, de Jesus JM, Houston M, et al. 2013 AHA/ACC guideline on lifestyle management to reduce cardiovascular risk: a report of the American College of Cardiology/American Heart Association Task Force on Practice Guidelines. *J Am Coll Cardiol.* 2014; 63: 2960-2984.

[3] *Ibid.*, p. 2966.

[4] Dietary Guidelines Advisory Committee, *op. cit.*

[5] United States Department of Agriculture Nutrition Evidence Library. *What is the Relationship Between Added Sugars and Risk of Cardiovascular Disease?* Available at: http://www.nel.gov/conclusion.cfm?conclusion_statement_id=250454. Accessed September 18, 2015.

[6] Yang Q, Zhang Z, Gregg EW, Flanders WD, Merritt R, et al. Added sugar intake and cardiovascular diseases mortality among US adults. *JAMA Intern Med.* 2014;174:516-524

[7] de Koning L, Malik VS, Kellogg MD, Rimm EB, Willett WC, et al. Sweetened beverage consumption, incident coronary heart disease, and biomarkers of risk in men. *Circulation.* 2012; 125:1735-1741, s1731; Bernstein AM, de Koning L, Flint AJ, Rexrode KM, Willett WC. Soda consumption and the risk of stroke in men and women. *Am J Clin Nutr*. 2012;95: 1190-1199.

[8] Te Morenga LA, Howatson AJ, Jones RM, Mann J. Dietary sugars and cardiometabolic risk: systematic review and meta-analyses of randomized controlled trials of the effects on blood pressure and lipids. *Am J Clin Nutr*. 2014; 100:65-79; Stanhope KL, Medici V, Bremer AA, Lee V, Lam HD, et al. A dose-response study of consuming high-fructose corn syrup-sweetened beverages on lipid/lipoprotein risk factors for cardiovascular disease in young adults. *Am J Clin Nutr.* 2015; 101:1144-1154.

[9] Stanhope KL, Bremer AA, Medici V, Nakajima K, Ito Y, et al. Consumption of fructose and high fructose corn syrup increase postprandial triglycerides, LDL-cholesterol, and apolipoprotein-B in young men and women. *J Clin Endocrinol Metab.* 2011;96: E1596-1605; Stanhope KL, Schwarz JM, Keim NL, Griffen SC, Bremer AA, et al. Consuming fructose-sweetened, not glucose-sweetened, beverages increases visceral adiposity and lipids and decreases insulin sensitivity in overweight/obese humans. *J Clin Invest.* 2009; 119:1322-1334.

[10] Welsh JA, Sharma A, Cunningham SA, Vos MB (2011). Consumption of added sugars and indicators of cardiovascular disease among US adolescents. *Circulation* 123 (3), 249–257.

[11] Appel LJ, Sacks FM, Carey VJ, Obarzanek E, Swaim JF, et al. Effects of protein, monounsaturated fat, and carbohydrate intake on blood pressure and serum lipids: results of the OmniHeart randomized trial. *JAMA.* 2005; 294:2455-2464.

[12] Dietary Guidelines Advisory Committee, *op. cit.*

[13] Johnson RK, Appel LJ, Brands M, Howard BV, Lefevre M, et al. Dietary sugars intake and cardiovascular health: a scientific statement from the American Heart Association. 2009; 120, 1011–1020.

[14] Malik VS, Pan A, Willett WC, Hu FB. Sugar-sweetened beverages and weight gain in children and adults: a systematic review and meta-analysis. *Am J Clin Nutr*. 2013;98: 1084-1102; Te Morenga L, Mallard S, Mann J. Dietary sugars and body weight: systematic review and meta-analyses of randomised controlled trials and cohort studies. *BMJ.* 2013; 346:e7492.

[15] de Ruyter JC, Olthof MR, Seidell JC, Katan MB. A trial of sugar-free or sugar-sweetened beverages and body weight in children. *N Engl J Med.* 2012;367: 1397-1406.

[16] Malik VS, Popkin BM, Bray GA, Despres JP, Willett WC, et al. Sugar-sweetened beverages and risk of metabolic syndrome and type 2 diabetes: a meta-analysis. *Diabetes Care*. 2010;33: 2477-2483.

[17] Moynihan PJ. Response to letter to the editor, "Effect on caries of restricting sugars intake: systematic review to inform WHO guidelines". *J Dent Res.* Vol 93. United States. 2014:531.

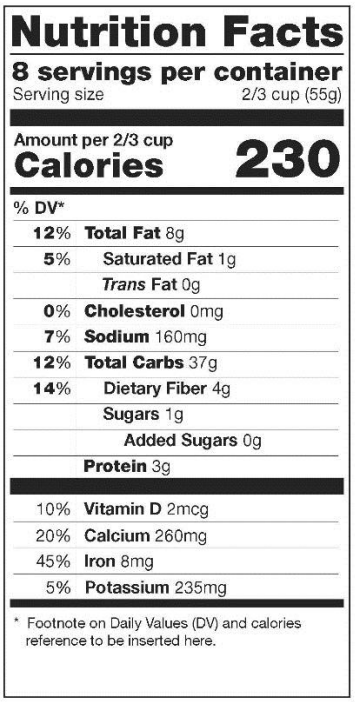
[18] Gupta P, Gupta N, Pawar AP, Birajdar SS, Natt AS, et al. Role of sugar and sugar substitutes in dental caries: a review. *ISRN Dent.* 2013; 2013:519421.
[19] *Ibid.*
[20] Opinion Research Corporation International. Online Caravan Nutrition Facts Label Study. July 10-13, 2014. Princeton, NJ.
[21] Pan A, Malik VS, Hao T, Willett WC, Mozaffarian D, et al. Changes in water and beverage intake and long-term weight changes: results from three prospective cohort studies. *Int J Obes (Lond).* 2013; 37: 1378-1385; Xi B, Li S, Liu Z, Tian H, Yin X, et al. Intake of fruit juice and incidence of type 2 diabetes: a systematic review and meta-analysis. *PLoS One.* 2014; 9:e93471; Muraki I, Imamura F, Manson JE, Hu FB, Willet WC, et al. Fruit consumption and risk of type 2 diabetes: results from three prospective longitudinal cohort studies. *BMJ.* 2013; 347:f5001.
[22] World Health Organization. WHO calls on countries to reduce sugars intake among adults and children. http://www.who.int/mediacentre/news/releases/2015/sugar-guideline/en/.
[23] *Ibid.*
[24]Center for Science in the Public Interest. Sugar Nutrition Facts Label Survey of 1,011 Consumers by Online Caravan. April 23-26, 2015. Available on-line at http://cspinet.org/new/pdf/sugary-survey.pdf.
[25] Vanderlee L, White CM, Bordes I, Hobin EP, Hammond D. The Efficacy of Sugar Labeling Formats: Implications for Labeling Policy. *Obesity.* (2015).
[26] Kyle TK, Thomas DM. Added Sugar in the Nutrition Facts Label: Consumer Needs and Scientific Uncertainty. *Obesity.* (2015).
[27] Dietary Guidelines Advisory Committee, *op. cit.*
[28] *Ibid.*
[29] World Health Organization, *op cit.*
[30] *Ibid.*
[31] Dietary Guidelines Advisory Committee, *op. cit.*, Table D6.1.
[32] Food Labeling: Revision of the Nutrition and Supplemental Facts Labels; Supplemental Proposed Rule to Solicit Comment on Limited Additional Provisions. (2015). *Docket No. FDA-2012-N-1210.*
[33] *Ibid.*
[34] United States Department of Agriculture. Estimated Calorie Needs per Day by Age, Gender, and Physical Activity Level. http://www.cnpp.usda.gov/sites/default/files/usda_food_patterns/EstimatedCalorieNeedsPerDayTable.pdf . Accessed September 18, 2015.
[35] In addition to providing much-needed specific information on added sugars, such labels would also assist parents and older children by making clear the differences in sodium levels that are relevant to child and adult diets.
[36] 21 CFR 101.9.
[37] Center for Science in the Public Interest. Unrealistic serving sizes understate calories, sodium, saturated fat, says CSPI. Press Release. August 2, 2011. http://cspinet.org/new/201108021.html. Accessed April 23, 2014.
[38]Center for Science in the Public Interest. Sugar Nutrition Facts Label Survey of 1,011 Consumers by Online Caravan, *op. cit.*
[39] 79 FR at 11880 at 11883.
[40] Dietary Guidelines Advisory Committee, *op. cit.*, Part D. Chapter 3, Page 25.

Appendix 1: Center for Science in the Public Interest Consumer Surveys (2014)

N1 The government is proposing to update the Nutrition Facts label. Which label do you prefer? [Select one answer. Rotate 01-02 in same order as images]

[ROTATE ORDER OF IMAGES]

Label B:



Nutrition Facts

8 servings per container

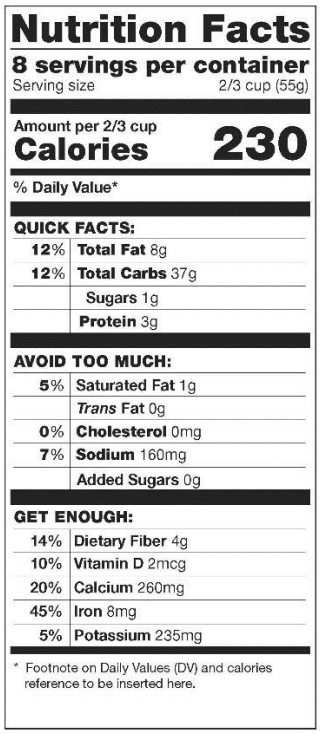
Serving size 2/3 cup (55g)

Amount per 2/3 cup
Calories **230**

% DV*	
12%	**Total Fat** 8g
5%	Saturated Fat 1g
	Trans Fat 0g
0%	**Cholesterol** 0mg
7%	**Sodium** 160mg
12%	**Total Carbs** 37g
14%	Dietary Fiber 4g
	Sugars 1g
	Added Sugars 0g
	Protein 3g
10%	**Vitamin D** 2mcg
20%	**Calcium** 260mg
45%	**Iron** 8mg
5%	**Potassium** 235mg

* Footnote on Daily Values (DV) and calories reference to be inserted here.

Label C:



Nutrition Facts

8 servings per container

Serving size 2/3 cup (55g)

Amount per 2/3 cup
Calories **230**

% Daily Value*

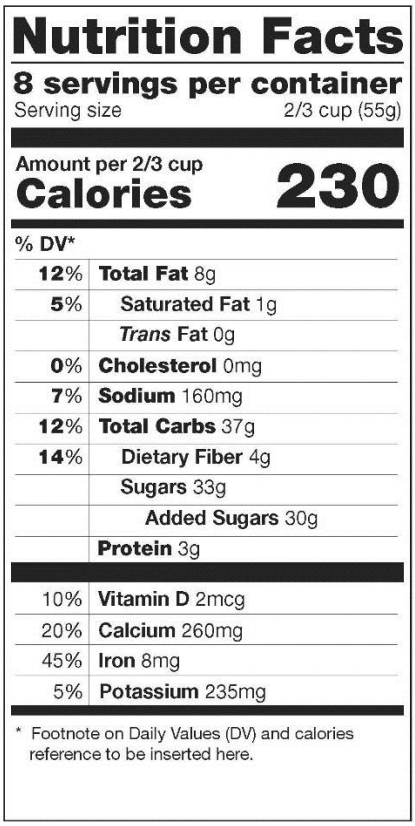
QUICK FACTS:	
12%	**Total Fat** 8g
12%	**Total Carbs** 37g
	Sugars 1g
	Protein 3g
AVOID TOO MUCH:	
5%	Saturated Fat 1g
	Trans Fat 0g
0%	**Cholesterol** 0mg
7%	**Sodium** 160mg
	Added Sugars 0g
GET ENOUGH:	
14%	Dietary Fiber 4g
10%	**Vitamin D** 2mcg
20%	**Calcium** 260mg
45%	**Iron** 8mg
5%	**Potassium** 235mg

* Footnote on Daily Values (DV) and calories reference to be inserted here.

01 Label B
02 Label C
03 I don't have a preference

PROGRAMMING NOTE: SHOW LABEL L TO HALF OF THE RESPONDENTS AND LABEL M TO THE OTHER HALF

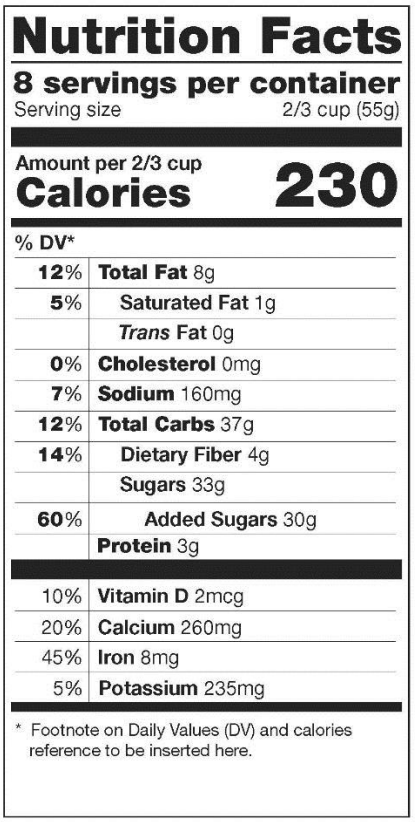
N2 [LABEL L]



Nutrition Facts	
8 servings per container	
Serving size	2/3 cup (55g)
Amount per 2/3 cup Calories	230
% DV*	
12%	**Total Fat** 8g
5%	**Saturated Fat** 1g
	***Trans* Fat** 0g
0%	**Cholesterol** 0mg
7%	**Sodium** 160mg
12%	**Total Carbs** 37g
14%	**Dietary Fiber** 4g
	Sugars 33g
	Added Sugars 30g
	Protein 3g
10%	**Vitamin D** 2mcg
20%	**Calcium** 260mg
45%	**Iron** 8mg
5%	**Potassium** 235mg

* Footnote on Daily Values (DV) and calories reference to be inserted here.

[LABEL M]



Nutrition Facts	
8 servings per container	
Serving size	2/3 cup (55g)
Amount per 2/3 cup Calories	230
% DV*	
12%	**Total Fat** 8g
5%	**Saturated Fat** 1g
	***Trans* Fat** 0g
0%	**Cholesterol** 0mg
7%	**Sodium** 160mg
12%	**Total Carbs** 37g
14%	**Dietary Fiber** 4g
	Sugars 33g
60%	**Added Sugars** 30g
	Protein 3g
10%	**Vitamin D** 2mcg
20%	**Calcium** 260mg
45%	**Iron** 8mg
5%	**Potassium** 235mg

* Footnote on Daily Values (DV) and calories reference to be inserted here.

What percent of your recommended daily limit of added sugars is in one serving of this food? [Select one answer]

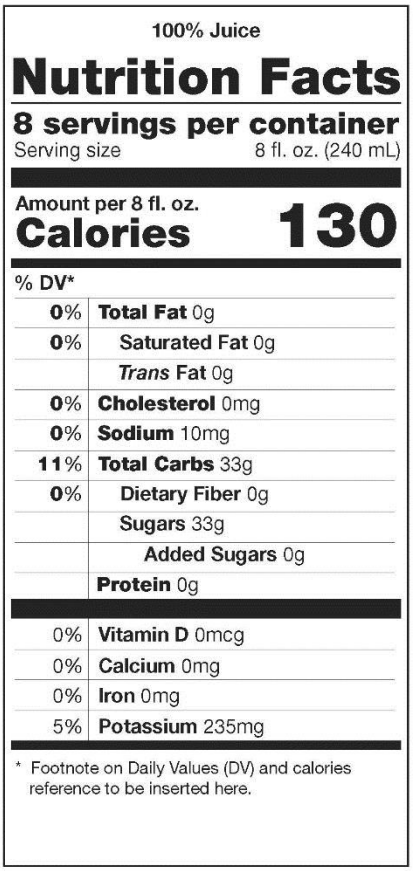
01 20%
02 40%
03 60%
04 80%
05 I can't tell from this label
06 I don't know

3

N3 Please look at the following labels. Which product is a better choice if you wanted to consume less of the sugars that naturally occur in apple, grape, and other juices? [Select one answer. Rotate 01-02 in same order as images]

[ROTATE ORDER OF IMAGES]

Juice G:



100% Juice

Nutrition Facts

8 servings per container

Serving size 8 fl. oz. (240 mL)

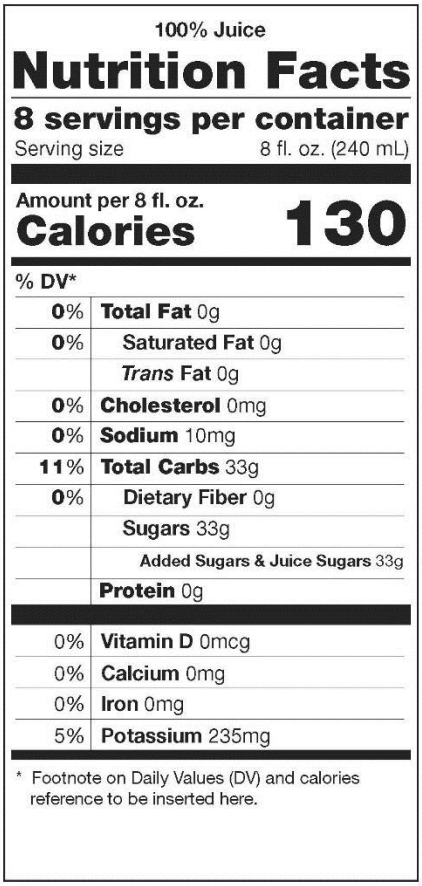
Amount per 8 fl. oz.

Calories 130

% DV*	
0%	**Total Fat** 0g
0%	**Saturated Fat** 0g
	***Trans* Fat** 0g
0%	**Cholesterol** 0mg
0%	**Sodium** 10mg
11%	**Total Carbs** 33g
0%	**Dietary Fiber** 0g
	Sugars 33g
	Added Sugars 0g
	Protein 0g
0%	**Vitamin D** 0mcg
0%	**Calcium** 0mg
0%	**Iron** 0mg
5%	**Potassium** 235mg

* Footnote on Daily Values (DV) and calories reference to be inserted here.

Juice H:



100% Juice

Nutrition Facts

8 servings per container

Serving size 8 fl. oz. (240 mL)

Amount per 8 fl. oz.

Calories 130

% DV*	
0%	**Total Fat** 0g
0%	**Saturated Fat** 0g
	***Trans* Fat** 0g
0%	**Cholesterol** 0mg
0%	**Sodium** 10mg
11%	**Total Carbs** 33g
0%	**Dietary Fiber** 0g
	Sugars 33g
	Added Sugars & Juice Sugars 33g
	Protein 0g
0%	**Vitamin D** 0mcg
0%	**Calcium** 0mg
0%	**Iron** 0mg
5%	**Potassium** 235mg

* Footnote on Daily Values (DV) and calories reference to be inserted here.

01 Juice G is a better choice
02 Juice H is a better choice
03 They are both the same
04 I don't know

PROGRAMMING NOTE: SHOW LABEL R TO HALF OF THE RESPONDENTS AND LABEL T TO THE OTHER HALF

N4 [LABEL R]

Nutrition Facts

8 servings per container

Serving size 2/3 cup (55g)

Amount per 2/3 cup

Calories 230

% DV*	
12%	**Total Fat** 8g
5%	**Saturated Fat** 1g
	***Trans* Fat** 0g
0%	**Cholesterol** 0mg
7%	**Sodium** 160mg
12%	**Total Carbs** 37g
7%	**Dietary Fiber** 2g
	Sugars 35g
	Added Sugars 20g
	Protein 3g
10%	**Vitamin D** 2mcg
20%	**Calcium** 260mg
45%	**Iron** 8mg
5%	**Potassium** 235mg

* Footnote on Daily Values (DV) and calories reference to be inserted here.

[LABEL T]

Nutrition Facts

8 servings per container

Serving size 2/3 cup (55g)

Amount per 2/3 cup

Calories 230

% DV*	
12%	**Total Fat** 8g
5%	**Saturated Fat** 1g
	***Trans* Fat** 0g
0%	**Cholesterol** 0mg
7%	**Sodium** 160mg
12%	**Total Carbs** 37g
7%	**Dietary Fiber** 2g
	Fruit & Milk Sugars 15g
	Added Sugars 20g
	Protein 3g
10%	**Vitamin D** 2mcg
20%	**Calcium** 260mg
45%	**Iron** 8mg
5%	**Potassium** 235mg

* Footnote on Daily Values (DV) and calories reference to be inserted here.

How much naturally occurring sugar, such as from fruit or milk, does one serving of this food contain? [Select one answer]

01 15g
02 20g
03 35g
04 55g
05 I can’t tell from this label
06 I don’t know

PROGRAMMING NOTE: SHOW LABEL P TO HALF OF THE RESPONDENTS AND LABEL K TO THE OTHER HALF

N5 [LABEL P]

Nutrition Facts

8 servings per container

Serving size 2/3 cup (55g)

Amount per 2/3 cup

Calories 230

% DV*	
12%	**Total Fat** 8g
5%	**Saturated Fat** 1g
	***Trans* Fat** 0g
0%	**Cholesterol** 0mg
7%	**Sodium** 160mg
12%	**Total Carbs** 37g
7%	**Dietary Fiber** 2g
	Sugars 35g
	Added Sugars 20g
	Protein 3g
10%	**Vitamin D** 2mcg
20%	**Calcium** 260mg
45%	**Iron** 8mg
5%	**Potassium** 235mg

* Footnote on Daily Values (DV) and calories reference to be inserted here.

[LABEL K]

Nutrition Facts

8 servings per container

Serving size 2/3 cup (55g)

Amount per 2/3 cup

Calories 230

% DV*	
12%	**Total Fat** 8g
5%	**Saturated Fat** 1g
	***Trans* Fat** 0g
0%	**Cholesterol** 0mg
7%	**Sodium** 160mg
12%	**Total Carbs** 37g
7%	**Dietary Fiber** 2g
	Total Sugars 35g
	Added Sugars 20g
	Protein 3g
10%	**Vitamin D** 2mcg
20%	**Calcium** 260mg
45%	**Iron** 8mg
5%	**Potassium** 235mg

* Footnote on Daily Values (DV) and calories reference to be inserted here.

How much total sugar does one serving of this food contain? [Select one answer]

01 15g
02 20g
03 35g
04 55g
05 I can’t tell from this label
06 I don’t know

PROGRAMMING NOTE: SHOW LABEL S TO HALF OF THE RESPONDENTS AND LABEL W TO THE OTHER HALF

N6 [LABEL S]

Nutrition Facts

8 servings per container

Serving size 2/3 cup (55g)

Amount per 2/3 cup
Calories 230

	% DV*
Total Fat 8g	**12%**
Saturated Fat 1g	**5%**
***Trans* Fat** 0g	
Cholesterol 0mg	**0%**
Sodium 160mg	**7%**
Total Carbs 37g	**12%**
Dietary Fiber 4g	**14%**
Sugars 1g	
Added Sugars 0g	
Protein 3g	
Vitamin D 2mcg	10%
Calcium 260mg	20%
Iron 8mg	45%
Potassium 235mg	5%

* Footnote on Daily Values (DV) and calories reference to be inserted here.

[LABEL W]

Nutrition Facts

8 servings per container

Serving size 2/3 cup (55g)

Amount per 2/3 cup
Calories 230

% DV*	
12%	**Total Fat** 8g
5%	**Saturated Fat** 1g
	***Trans* Fat** 0g
0%	**Cholesterol** 0mg
7%	**Sodium** 160mg
12%	**Total Carbs** 37g
14%	**Dietary Fiber** 4g
	Sugars 1g
	Added Sugars 0g
	Protein 3g
10%	**Vitamin D** 2mcg
20%	**Calcium** 260mg
45%	**Iron** 8mg
5%	**Potassium** 235mg

* Footnote on Daily Values (DV) and calories reference to be inserted here.

Eating one serving of this food item provides how much of your recommended daily limit of saturated fat? [Select one answer]

01 1%
02 5%
03 12%
04 50%
05 I can't tell from this label
06 I don't know

N7 Salt is the main source of sodium in foods. Which description would you prefer on a Nutrition Facts label: 'Salt' or 'Sodium'? [Select one answer. Rotate 01-02]

01 Salt
02 Sodium
03 I don't have a preference

8

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N1

The government is proposing to update the Nutrition Facts label. Which label do you prefer?

		Sex		Age						Region				Race		
	Total	Male	Female	18-24	25-34	35-44	45-54	55-64	65+	Northeast	Midwest	South	West	White Only (Non-Hisp)	Black Only (Non-Hisp)	Hispanic (Any Race)
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)
Unweighted Total	1008	505	503	101	204	145	204	175	179	188	200	381	239	726	84	111
Weighted Total	1008	490	518	132*	177	171	185	162	181	179	216	376	236	633	124*	170
Have a preference (Net)	857	407	450	122	153	143	167	129	143	160	185	307	206	531	102	156
	85%	83%	87%	93%HI	87%	84%	90%HI	79%	79%	89%L	85%	81%	87%	84%	82%	91%N
Label B	491	229	262	61	81	76	96	86	92	87	113	174	117	317	60	75
	49%	47%	50%	46%	46%	45%	52%	53%	51%	49%	52%	46%	49%	50%	49%	44%
Label C	366	177	188	61	72	67	71	43	51	72	72	132	89	214	41	81
	36%	36%	36%	47%HI	41%HI	39%H	38%H	27%	28%	40%	33%	35%	38%	34%	34%	47%N
I don't have a preference	151	83	68	10	24	28	19	33	38	20	31	70	30	102	22	15
	15%	17%	13%	7%	13%	16%	10%	21%DG	21%DG	11%	15%	19%J	13%	16%P	18%	9%

Proportions/Means: Columns Tested (5% risk level) - B/C - D/E/F/G/H/I - J/K/L/M - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N1

The government is proposing to update the Nutrition Facts label. Which label do you prefer?

		Household Income					H.H. Size			Children In H.H.				Education		
	Total	LT $35K	$35K-LT $50K	$50K-LT $75K	$75K-LT $100K	$100K Or More	1	2	3 Or More	None	Any	Under 13	13-17	HS Grad or less	Coll Incom-plete	Coll Grad
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)
Unweighted Total	1008	302	150	201	127	228	184	421	403	735	273	204	123	310	265	433
Weighted Total	1008	338	150	199	120	201	187	393	428	720	288	210	135	431	222	355
Have a preference (Net)	857	272	130	167	105	182	156	327	373	610	247	182	116	352	190	315
	85%	81%	87%	84%	88%	90%B	83%	83%	87%	85%	86%	87%	86%	82%	85%	89%N
Label B	491	139	84	99	66	104	98	201	191	358	134	94	65	199	108	184
	49%	41%	56%B	50%	55%B	52%B	53%	51%	45%	50%	46%	45%	48%	46%	48%	52%
Label C	366	134	47	68	39	77	58	126	182	252	114	88	51	153	82	130
	36%	40%	31%	34%	33%	38%	31%	32%	43%GH	35%	39%	42%	38%	36%	37%	37%
I don't have a preference	151	65	20	32	15	20	31	66	55	111	41	28	19	78	33	40
	15%	19%F	13%	16%	12%	10%	17%	17%	13%	15%	14%	13%	14%	18%P	15%	11%

Proportions/Means: Columns Tested (5% risk level) - B/C/D/E/F - G/H/I - J/K - N/O/P
Overlap formulae used.

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N2

What percent of your recommended daily limit of added sugars is in one serving of this food?

Base = Saw Label L

	Total (A)	Sex: Male (B)	Sex: Female (C)	Age: 18-24 (D)	Age: 25-34 (E)	Age: 35-44 (F)	Age: 45-54 (G)	Age: 55-64 (H)	Age: 65+ (I)	Region: Northeast (J)	Region: Midwest (K)	Region: South (L)	Region: West (M)	Race: White Only (Non-Hisp) (N)	Race: Black Only (Non-Hisp) (O)	Race: Hispanic (Any Race) (P)
Unweighted Total	505	256	249	47	115	71	93	92	87	90	96	198	121	352	42	59
Weighted Total	505	249	256	65*	103*	80*	86*	85*	86*	85*	101*	198	121	302	64*	91*
Can tell from label (Net)	111	58	53	27	31	13	22	11	8	21	17	49	24	46	20	32
	22%	23%	21%	42%FHI	30%FHI	16%	25%HI	13%	9%	25%	17%	25%	20%	15%	30%N	35%N
20%	27	16	11	7	5	2	6	5	1	6	5	15	1	11	6	7
	5%	6%	4%	11%I	5%	3%	7%I	6%	1%	7%M	5%	8%M	1%	3%	10%	7%
40%	32	20	11	6	12	3	9	1	1	7	6	11	8	16	6	4
	6%	8%	4%	9%HI	12%HI	4%	11%HI	1%	1%	9%	6%	5%	7%	5%	9%	5%
60%	29	12	17	9	5	4	2	3	6	4	2	15	7	12	3	11
	6%	5%	7%	15%EGH	4%	5%	3%	3%	7%	5%	2%	8%	6%	4%	4%	12%N
80%	23	10	14	5	9	3	4	2	1	3	4	8	7	7	5	10
	5%	4%	5%	7%	9%I	4%	4%	2%	1%	4%	4%	4%	6%	2%	8%	11%N
I can't tell from this label	292	149	144	25	48	51	55	61	52	51	66	107	69	195	29	46
	58%	60%	56%	39%	47%	63%D	65%DE	72%DE	61%D	59%	66%	54%	57%	65%OP	45%	50%
I don't know	102	42	59	13	23	17	9	13	26	14	18	42	28	62	16	14
	20%	17%	23%	20%	23%G	21%	10%	16%	30%GH	16%	17%	21%	23%	20%	24%	15%

Proportions/Means: Columns Tested (5% risk level) - B/C - D/E/F/G/H/I - J/K/L/M - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N2

What percent of your recommended daily limit of added sugars is in one serving of this food?

Base = Saw Label L

		Household Income					H.H. Size			Children In H.H.				Education		
	Total	LT $35K	$35K- LT $50K	$50K- LT $75K	$75K- LT $100K	$100K Or More	1	2	3 Or More	None	Any	Under 13	13- 17	HS Grad or less	Coll Incom- plete	Coll Grad
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)
Unweighted Total	505	156	80	106	61	102	99	199	207	365	140	107	64	154	122	229
Weighted Total	505	174	80*	102*	58*	90*	105*	183	218	354	151	116*	70*	214	104	187
Can tell from label (Net)	111	40	16	22	15	18	21	28	62	67	44	36	19	54	16	41
	22%	23%	20%	21%	26%	20%	20%	15%	29%H	19%	29%J	31%	27%	25%	15%	22%
20%	27	11	5	6	2	4	1	11	14	17	10	9	5	16	4	7
	5%	6%	6%	6%	3%	4%	1%	6%	6%	5%	7%	8%	8%	7%	4%	4%
40%	32	13	6	2	6	5	11	5	16	22	10	7	4	20	1	11
	6%	8%	7%	2%	11%D	5%	10%H	3%	7%	6%	7%	6%	6%	9%O	1%	6%
60%	29	10	2	8	4	5	3	9	17	17	12	8	6	10	7	12
	6%	6%	2%	8%	7%	5%	3%	5%	8%	5%	8%	7%	8%	5%	7%	6%
80%	23	6	3	5	3	5	6	3	15	12	12	11	4	8	3	12
	5%	3%	4%	5%	6%	6%	6%	2%	7%H	3%	8%	9%	6%	4%	3%	6%
I can't tell from this label	292	86	47	65	37	58	55	121	117	209	83	60	42	98	72	122
	58%	49%	59%	64%B	63%	65%B	52%	66%GI	54%	59%	55%	52%	59%	46%	70%N	65%N
I don't know	102	48	17	16	7	14	29	34	38	77	24	21	9	62	16	24
	20%	28%DEF	21%	15%	12%	15%	28%	19%	18%	22%	16%	18%	14%	29%OP	15%	13%

Proportions/Means: Columns Tested (5% risk level) - B/C/D/E/F - G/H/I - J/K - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N2

What percent of your recommended daily limit of added sugars is in one serving of this food?

Base = Saw Label M

		Sex		Age						Region				Race		
	Total (A)	Male (B)	Female (C)	18-24 (D)	25-34 (E)	35-44 (F)	45-54 (G)	55-64 (H)	65+ (I)	Northeast (J)	Midwest (K)	South (L)	West (M)	White Only (Non-Hisp) (N)	Black Only (Non-Hisp) (O)	Hispanic (Any Race) (P)
Unweighted Total	503	249	254	54	89	74	111	83	92	98	104	183	118	374	42	52
Weighted Total	503	241	262	67*	74*	90*	99*	78*	95*	94*	116*	179	115*	331	59*	79*
Can tell from label (Net)	378	187	191	51	60	69	73	58	66	71	89	130	88	252	38	63
	75%	78%	73%	77%	81%	77%	74%	75%	69%	75%	77%	73%	76%	76%	64%	80%
20%	12	6	6	5	2	3	0	2	0	3	3	4	2	9	0	3
	2%	2%	2%	7%GI	2%	3%	0	3%	0	3%	3%	2%	2%	3%	0	4%
40%	25	14	11	10	6	3	1	5	0	3	3	18	2	6	7	8
	5%	6%	4%	15%FGI	8%GI	4%	1%	6%I	0	3%	3%	10%JKM	2%	2%	12%N	10%N
60%	333	166	167	35	50	63	69	49	66	64	82	106	82	232	31	51
	66%	69%	64%	53%	68%	70%	70%D	64%	69%	68%	71%	59%	71%	70%O	52%	64%
80%	8	2	6	1	3	0	3	1	0	2	2	2	2	6	0	2
	2%	1%	2%	1%	3%	0	3%	2%	0	2%	1%	1%	2%	2%	0	3%
I can't tell from this label	91	37	54	8	8	16	20	16	23	18	19	33	20	63	14	9
	18%	15%	20%	12%	11%	17%	20%	20%	25%E	19%	17%	19%	17%	19%	23%	11%
I don't know	35	17	18	8	6	5	6	4	6	5	7	15	8	16	8	7
	7%	7%	7%	12%	8%	6%	7%	5%	6%	5%	6%	8%	7%	5%	13%N	9%

Proportions/Means: Columns Tested (5% risk level) - B/C - D/E/F/G/H/I - J/K/L/M - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N2

What percent of your recommended daily limit of added sugars is in one serving of this food?

Base = Saw Label M

		Household Income					H.H. Size			Children In H.H.				Education		
	Total	LT $35K	$35K- LT $50K	$50K- LT $75K	$75K- LT $100K	$100K Or More	1	2	3 Or More	None	Any	Under 13	13- 17	HS Grad or less	Coll Incom- plete	Coll Grad
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)
Unweighted Total	503	146	70	95	66	126	85	222	196	370	133	97	59	156	143	204
Weighted Total	503	164	70*	97*	61*	111	83*	210	210	367	136	94*	65*	217	118	168
Can tell from label (Net)	378	114	58	74	46	85	67	150	161	268	110	78	52	158	92	128
	75%	70%	83%	76%	75%	77%	81%	71%	77%	73%	81%	83%	80%	73%	78%	76%
20%	12	5	3	3	1	0	0	8	4	8	3	3	3	6	3	3
	2%	3%	4%F	3%	1%	0	0	4%	2%	2%	3%	4%	4%	3%	3%	2%
40%	25	10	6	5	2	3	5	4	17	14	11	10	4	15	5	5
	5%	6%	8%	5%	3%	3%	5%	2%	8%H	4%	8%	11%	6%	7%	4%	3%
60%	333	98	50	63	44	79	62	137	135	242	91	61	44	134	81	118
	66%	60%	70%	65%	72%	72%	75%	65%	64%	66%	67%	64%	68%	62%	68%	70%
80%	8	2	1	3	0	2	1	2	5	4	4	4	1	3	3	2
	2%	1%	1%	3%	0	2%	1%	1%	2%	1%	3%	4%	1%	1%	2%	1%
I can't tell from this label	91	30	10	15	12	23	15	43	32	72	18	9	10	42	20	29
	18%	18%	14%	15%	20%	21%	18%	21%	15%	20%	13%	10%	16%	19%	17%	17%
I don't know	35	20	2	8	3	2	1	17	17	26	8	7	3	17	6	12
	7%	12%CF	3%	9%F	4%	2%	1%	8%G	8%G	7%	6%	7%	5%	8%	5%	7%

Proportions/Means: Columns Tested (5% risk level) - B/C/D/E/F - G/H/I - J/K - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N3

Please look at the following labels. Which product is a better choice if you wanted to consume less of the sugars that naturally occur in apple, grape, and other juices?

		Sex		Age						Region				Race		
	Total (A)	Male (B)	Female (C)	18-24 (D)	25-34 (E)	35-44 (F)	45-54 (G)	55-64 (H)	65+ (I)	Northeast (J)	Midwest (K)	South (L)	West (M)	White Only (Non-Hisp) (N)	Black Only (Non-Hisp) (O)	Hispanic (Any Race) (P)
Unweighted Total	1008	505	503	101	204	145	204	175	179	188	200	381	239	726	84	111
Weighted Total	1008	490	518	132*	177	171	185	162	181	179	216	376	236	633	124*	170
Either (Net)	628	302	326	87	110	128	105	88	111	108	130	237	153	374	89	119
	62%	62%	63%	66%	62%	75%EG HI	57%	54%	61%	60%	60%	63%	65%	59%	72%N	70%N
Juice G is a better choice	472	218	254	60	75	104	72	69	92	82	104	174	112	287	68	87
	47%	45%	49%	46%	42%	61%DE GH	39%	43%	51%G	46%	48%	46%	48%	45%	55%	51%
Juice H is a better choice	156	83	72	26	36	24	33	18	19	27	26	62	41	87	21	32
	15%	17%	14%	20%I	20%HI	14%	18%	11%	10%	15%	12%	17%	17%	14%	17%	19%
They are both the same	317	154	163	39	51	34	70	64	59	63	76	110	68	219	26	45
	31%	31%	31%	29%	29%	20%	38%F	39%F	33%F	35%	35%	29%	29%	35%O	21%	27%
I don't know	63	34	29	7	15	10	10	11	11	8	10	30	15	40	8	6
	6%	7%	6%	5%	9%	6%	5%	7%	6%	4%	5%	8%	6%	6%	7%	4%

Proportions/Means: Columns Tested (5% risk level) - B/C - D/E/F/G/H/I - J/K/L/M - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N3

Please look at the following labels. Which product is a better choice if you wanted to consume less of the sugars that naturally occur in apple, grape, and other juices?

		Household Income					H.H. Size			Children In H.H.				Education		
	Total	LT $35K	$35K- LT $50K	$50K- LT $75K	$75K- LT $100K	$100K Or More	1	2	3 Or More	None	Any	Under 13	13- 17	HS Grad or less	Coll Incom- plete	Coll Grad
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)
Unweighted Total	1008	302	150	201	127	228	184	421	403	735	273	204	123	310	265	433
Weighted Total	1008	338	150	199	120	201	187	393	428	720	288	210	135	431	222	355
Either (Net)	628	190	91	146	72	130	107	223	298	423	206	157	90	260	135	233
	62%	56%	60%	73%BCE	60%	65%	57%	57%	70%GH	59%	71%J	75%	67%	60%	61%	66%
Juice G is a better choice	472	148	67	107	55	94	69	178	226	316	156	122	61	210	99	164
	47%	44%	45%	54%B	46%	47%	37%	45%	53%GH	44%	54%J	58%	46%	49%	45%	46%
Juice H is a better choice	156	41	24	38	17	36	38	46	72	106	50	35	29	51	35	70
	15%	12%	16%	19%B	14%	18%	20%H	12%	17%	15%	17%	17%	21%	12%	16%	20%N
They are both the same	317	116	50	45	43	63	61	148	108	245	71	46	39	143	73	101
	31%	34%D	33%D	23%	36%D	31%	33%	38%I	25%	34%K	25%	22%	29%	33%	33%	29%
I don't know	63	32	10	8	4	8	20	22	22	52	11	7	6	28	15	20
	6%	9%DF	7%	4%	4%	4%	10%HI	5%	5%	7%	4%	3%	5%	6%	7%	6%

Proportions/Means: Columns Tested (5% risk level) - B/C/D/E/F - G/H/I - J/K - N/O/P
Overlap formulae used.

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N4

How much naturally occurring sugar, such as from fruit or milk, does one serving of this food contain?

Base = Saw Label R

		Sex		Age						Region				Race		
	Total (A)	Male (B)	Female (C)	18-24 (D)	25-34 (E)	35-44 (F)	45-54 (G)	55-64 (H)	65+ (I)	Northeast (J)	Midwest (K)	South (L)	West (M)	White Only (Non-Hisp) (N)	Black Only (Non-Hisp) (O)	Hispanic (Any Race) (P)
Unweighted Total	505	255	250	52	101	73	101	80	98	87	115	201	102	370	43	54
Weighted Total	513	247	266	74*	89*	88*	91*	72*	99*	85*	127*	204	98*	325	67*	85*
Can tell from label (Net)	447	213	234	69	77	69	82	66	85	75	112	176	84	288	57	76
	87%	86%	88%	94%F	86%	78%	90%F	90%F	86%	88%	88%	86%	86%	89%	85%	89%
15g	145	68	77	20	23	27	32	21	22	18	35	55	38	107	9	23
	28%	28%	29%	27%	26%	30%	36%	30%	22%	21%	27%	27%	39%J	33%O	14%	26%
20g	39	22	17	16	9	1	6	2	4	13	5	18	3	14	10	13
	8%	9%	6%	21%FG HI	10%F	2%	7%	3%	4%	16%KM	4%	9%	3%	4%	16%N	15%N
35g	245	116	129	29	41	39	43	40	54	39	71	92	43	162	37	32
	48%	47%	49%	39%	46%	44%	48%	55%	55%	46%	56%	45%	44%	50%	55%	37%
55g	17	6	11	5	4	1	0	2	5	5	1	11	0	6	0	9
	3%	3%	4%	7%G	4%	2%	0	3%	5%G	6%M	1%	6%M	0	2%	0	10%NO
I can't tell from this label	28	19	9	3	4	7	2	4	8	3	8	12	6	15	6	4
	6%	8%	3%	4%	5%	8%	2%	5%	9%	3%	6%	6%	6%	5%	8%	5%
I don't know	38	15	23	2	8	13	7	3	5	7	7	16	8	21	4	5
	7%	6%	9%	2%	9%	14%DH	8%	4%	5%	8%	6%	8%	8%	7%	7%	6%

Proportions/Means: Columns Tested (5% risk level) - B/C - D/E/F/G/H/I - J/K/L/M - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N4

How much naturally occurring sugar, such as from fruit or milk, does one serving of this food contain?

Base = Saw Label R

		Household Income					H.H. Size			Children In H.H.				Education		
	Total	LT $35K	$35K- LT $50K	$50K- LT $75K	$75K- LT $100K	$100K Or More	1	2	3 Or More	None	Any	Under 13	13- 17	HS Grad or less	Coll Incom- plete	Coll Grad
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)
Unweighted Total	505	154	79	88	63	121	99	208	198	368	137	96	62	161	137	207
Weighted Total	513	184	77*	85*	59*	107	106*	190	217	360	153	106*	72*	228	116	169
Can tell from label (Net)	447	149	69	82	52	95	88	170	189	315	131	90	61	195	99	153
	87%	81%	89%	96%B	88%	88%	83%	89%	87%	88%	86%	85%	85%	85%	85%	91%
15g	145	36	25	28	17	40	30	55	61	105	40	27	18	40	33	72
	28%	19%	32%B	33%B	28%	37%B	28%	29%	28%	29%	26%	26%	25%	18%	28%N	43%NO
20g	39	17	10	5	4	3	10	7	21	23	16	7	11	24	9	5
	8%	9%	13%F	6%	7%	3%	10%	4%	10%H	6%	10%	7%	16%	11%P	8%P	3%
35g	245	92	33	44	26	51	44	104	97	179	66	47	29	124	51	70
	48%	50%	43%	51%	44%	48%	42%	55%	45%	50%	44%	44%	41%	55%P	44%	41%
55g	17	5	1	5	5	1	4	4	10	9	9	8	3	6	5	6
	3%	3%	2%	6%	9%F	1%	3%	2%	5%	2%	6%	7%	4%	3%	4%	4%
I can't tell from this label	28	15	2	3	3	5	8	8	12	20	8	7	3	10	9	9
	6%	8%	3%	4%	5%	5%	8%	4%	6%	6%	6%	6%	4%	5%	8%	5%
I don't know	38	20	6	0	4	8	10	12	16	25	13	9	8	23	8	7
	7%	11%D	8%D	0	7%D	7%D	9%	7%	7%	7%	8%	9%	12%	10%P	7%	4%

Proportions/Means: Columns Tested (5% risk level) - B/C/D/E/F - G/H/I - J/K - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N4

How much naturally occurring sugar, such as from fruit or milk, does one serving of this food contain?

Base = Saw Label T

	Total (A)	Sex: Male (B)	Sex: Female (C)	Age: 18-24 (D)	Age: 25-34 (E)	Age: 35-44 (F)	Age: 45-54 (G)	Age: 55-64 (H)	Age: 65+ (I)	Region: Northeast (J)	Region: Midwest (K)	Region: South (L)	Region: West (M)	Race: White Only (Non-Hisp) (N)	Race: Black Only (Non-Hisp) (O)	Race: Hispanic (Any Race) (P)
Unweighted Total	503	250	253	49	103	72	103	95	81	101	85	180	137	356	41	57
Weighted Total	495	243	252	58*	88*	82*	94*	90*	82*	94*	89*	173	138	308	56*	85*
Can tell from label (Net)	454	223	232	53	81	76	88	80	76	85	80	160	129	280	53	80
	92%	92%	92%	92%	92%	93%	93%	89%	93%	90%	90%	92%	93%	91%	94%	94%
15g	382	186	196	42	65	66	75	70	64	76	72	133	101	248	38	63
	77%	76%	78%	72%	74%	80%	80%	78%	77%	81%	80%	77%	73%	80%	68%	74%
20g	32	17	15	1	8	9	8	5	2	3	5	11	14	13	6	11
	7%	7%	6%	3%	9%	10%I	8%	6%	2%	3%	5%	6%	10%	4%	11%	13%N
35g	33	15	18	5	6	2	5	4	11	7	3	11	13	17	7	5
	7%	6%	7%	8%	7%	2%	5%	5%	14%F	7%	3%	6%	9%	6%	12%	6%
55g	7	4	3	5	2	0	0	0	0	0	1	5	1	2	2	2
	1%	2%	1%	9%FGHI	2%	0	0	0	0	0	1%	3%	1%	1%	3%	2%
I can't tell from this label	21	10	12	2	4	4	4	5	4	5	4	9	3	16	1	2
	4%	4%	5%	3%	4%	5%	4%	5%	4%	5%	4%	5%	2%	5%	3%	2%
I don't know	19	11	9	3	3	2	3	5	2	4	5	4	6	12	2	3
	4%	4%	3%	6%	4%	3%	3%	6%	3%	5%	6%	2%	4%	4%	4%	4%

Proportions/Means: Columns Tested (5% risk level) - B/C - D/E/F/G/H/I - J/K/L/M - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N4

How much naturally occurring sugar, such as from fruit or milk, does one serving of this food contain?

Base = Saw Label T

		Household Income					H.H. Size			Children In H.H.				Education		
	Total	LT $35K	$35K- LT $50K	$50K- LT $75K	$75K- LT $100K	$100K Or More	1	2	3 Or More	None	Any	Under 13	13-17	HS Grad or less	Coll Incom- plete	Coll Grad
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)
Unweighted Total	503	148	71	113	64	107	85	213	205	367	136	108	61	149	128	226
Weighted Total	495	154	73*	114*	60*	94*	82*	202	211	360	135	104*	63*	203	107	186
Can tell from label (Net)	454	137	67	107	55	89	78	185	191	328	127	97	60	186	98	171
	92%	89%	92%	94%	91%	94%	96%	91%	91%	91%	94%	93%	96%	92%	92%	92%
15g	382	113	60	89	41	79	61	158	163	280	102	77	50	152	87	144
	77%	74%	83%	78%	67%	84%E	74%	78%	77%	78%	76%	74%	79%	75%	81%	77%
20g	32	12	2	6	9	4	11	9	13	21	12	11	4	14	8	11
	7%	8%	3%	5%	14%CF	4%	13%H	4%	6%	6%	9%	11%	7%	7%	8%	6%
35g	33	8	5	13	2	5	6	18	9	25	7	6	4	15	3	15
	7%	5%	6%	11%	4%	5%	7%	9%	4%	7%	6%	6%	6%	7%	3%	8%
55g	7	3	0	0	3	1	1	0	6	2	5	3	2	6	0	1
	1%	2%	0	0	5%D	1%	1%	0	3%H	1%	4%J	3%	3%	3%	0	1%
I can't tell from this label	21	6	5	2	5	3	1	10	10	16	5	4	1	7	6	9
	4%	4%	7%	2%	8%	3%	2%	5%	5%	5%	4%	4%	2%	3%	5%	5%
I don't know	19	11	1	4	1	2	2	7	10	16	3	3	1	10	3	6
	4%	7%	1%	4%	1%	2%	3%	4%	5%	4%	2%	3%	2%	5%	3%	3%

Proportions/Means: Columns Tested (5% risk level) - B/C/D/E/F - G/H/I - J/K - N/O/P
Overlap formulae used. * small base

Question N5

How much total sugar does one serving of this food contain?

Base = Saw Label P

	Total (A)	Sex: Male (B)	Sex: Female (C)	Age: 18-24 (D)	Age: 25-34 (E)	Age: 35-44 (F)	Age: 45-54 (G)	Age: 55-64 (H)	Age: 65+ (I)	Region: Northeast (J)	Region: Midwest (K)	Region: South (L)	Region: West (M)	Race: White Only (Non-Hisp) (N)	Race: Black Only (Non-Hisp) (O)	Race: Hispanic (Any Race) (P)
Unweighted Total	503	254	249	58	107	65	94	96	83	90	107	186	120	363	44	57
Weighted Total	504	246	258	77*	95*	78*	82*	89*	82*	90*	116*	181	117*	310	67*	91*
Can tell from label (Net)	465	222	243	75	86	71	79	84	70	81	105	170	108	286	58	90
	92%	90%	94%	98%I	91%	91%	95%I	94%	85%	91%	90%	94%	93%	92%	88%	99%O
15g	11	7	3	7	1	2	1	0	0	3	3	5	0	1	1	8
	2%	3%	1%	9%EHI	1%	2%	1%	0	0	3%	3%	3%	0	*	2%	9%N
20g	8	3	5	2	3	1	0	2	1	4	2	1	0	4	0	3
	2%	1%	2%	2%	3%	1%	0	2%	1%	5%LM	2%	1%	0	1%	0	4%
35g	221	109	112	35	45	36	39	42	25	35	42	83	62	139	17	46
	44%	44%	43%	45%	47%I	46%	47%I	47%I	30%	39%	36%	46%	53%K	45%O	26%	51%O
55g	226	103	123	32	37	33	39	41	44	40	58	82	46	142	40	32
	45%	42%	48%	42%	39%	42%	47%	46%	54%	44%	50%	45%	40%	46%	60%P	35%
I can't tell from this label	21	14	7	0	3	3	2	3	10	7	5	6	2	15	3	1
	4%	6%	3%	0	3%	4%	2%	3%	13%DEGH	8%	4%	4%	2%	5%	5%	1%
I don't know	17	10	7	1	6	3	2	3	2	1	7	4	6	9	5	0
	3%	4%	3%	2%	6%	4%	2%	3%	3%	1%	6%	2%	5%	3%	7%P	0

Proportions/Means: Columns Tested (5% risk level) - B/C - D/E/F/G/H/I - J/K/L/M - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N5

How much total sugar does one serving of this food contain?

Base = Saw Label P

		Household Income					H.H. Size			Children In H.H.				Education		
	Total	LT $35K	$35K- LT $50K	$50K- LT $75K	$75K- LT $100K	$100K Or More	1	2	3 Or More	None	Any	Under 13	13- 17	HS Grad or less	Coll Incom- plete	Coll Grad
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)
Unweighted Total	503	145	76	109	65	108	99	205	199	359	144	103	71	155	132	216
Weighted Total	504	167	74*	106*	62*	94*	104*	187	212	349	155	109*	80*	218	112	174
Can tell from label (Net)	465	152	65	103	58	88	94	172	199	321	145	103	75	196	106	164
	92%	91%	87%	96%C	94%	93%	90%	92%	94%	92%	93%	94%	93%	90%	95%	94%
15g	11	7	1	1	3	0	1	2	8	4	6	3	4	4	3	3
	2%	4%	1%	1%	4%F	0	1%	1%	4%	1%	4%	2%	4%	2%	3%	2%
20g	8	4	2	1	1	1	0	3	4	3	4	3	2	4	2	2
	2%	2%	3%	1%	1%	1%	0	2%	2%	1%	3%	3%	2%	2%	2%	1%
35g	221	67	31	43	22	58	47	75	99	153	68	50	40	79	52	90
	44%	40%	42%	40%	35%	62%BC DE	45%	40%	47%	44%	44%	45%	50%	36%	47%	52%N
55g	226	75	31	59	33	29	46	93	87	161	65	48	30	110	49	68
	45%	45%F	42%	55%F	54%F	31%	44%	50%	41%	46%	42%	44%	37%	50%P	43%	39%
I can't tell from this label	21	7	8	1	3	3	7	9	5	16	5	1	4	13	3	5
	4%	4%	10%D	1%	4%	3%	7%	5%	2%	5%	3%	1%	5%	6%	3%	3%
I don't know	17	8	2	3	1	3	3	6	8	12	6	6	1	9	3	5
	3%	5%	2%	3%	1%	4%	3%	3%	4%	3%	4%	5%	2%	4%	3%	3%

Proportions/Means: Columns Tested (5% risk level) - B/C/D/E/F - G/H/I - J/K - N/O/P
Overlap formulae used. * small base

Question N5

How much total sugar does one serving of this food contain?

Base = Saw Label K

	Total (A)	Sex: Male (B)	Sex: Female (C)	Age: 18-24 (D)	Age: 25-34 (E)	Age: 35-44 (F)	Age: 45-54 (G)	Age: 55-64 (H)	Age: 65+ (I)	Region: Northeast (J)	Region: Midwest (K)	Region: South (L)	Region: West (M)	Race: White Only (Non-Hisp) (N)	Race: Black Only (Non-Hisp) (O)	Race: Hispanic (Any Race) (P)
Unweighted Total	505	251	254	43	97	80	110	79	96	98	93	195	119	363	40	54
Weighted Total	504	244	260	55*	82*	93*	103*	73*	99*	90*	100*	195	120*	323	57*	79*
Can tell from label (Net)	472	228	244	52	76	89	94	72	89	85	90	185	112	301	53	78
	94%	93%	94%	94%	93%	96%	92%	98%I	90%	95%	90%	95%	94%	93%	93%	99%
15g	7	3	4	1	3	3	0	1	0	0	1	5	1	4	4	0
	1%	1%	2%	2%	3%	3%	0	1%	0	0	1%	3%	1%	1%	6%N	0
20g	26	17	9	13	3	5	4	1	0	4	2	13	6	11	5	5
	5%	7%	4%	23%EFGHI	3%	6%I	4%	2%	0	5%	2%	7%	5%	3%	9%	6%
35g	325	153	172	28	61	63	71	44	58	59	71	120	75	205	35	58
	65%	63%	66%	51%	74%DI	68%	69%	60%	59%	66%	72%	62%	63%	63%	61%	73%
55g	114	55	59	10	11	18	19	25	30	22	15	46	30	81	10	15
	23%	22%	23%	18%	13%	20%	19%	35%EFG	31%E	24%	15%	24%	25%	25%	17%	19%
I can't tell from this label	13	7	6	0	2	1	5	1	4	2	3	3	5	10	0	1
	3%	3%	2%	0	3%	1%	5%	2%	4%	3%	3%	1%	4%	3%	0	1%
I don't know	19	9	10	3	3	3	3	0	6	2	7	8	2	12	4	0
	4%	4%	4%	6%	4%	3%	3%	0	6%H	2%	7%	4%	2%	4%	7%	0

Proportions/Means: Columns Tested (5% risk level) - B/C - D/E/F/G/H/I - J/K/L/M - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N5

How much total sugar does one serving of this food contain?

Base = Saw Label K

		Household Income					H.H. Size			Children In H.H.				Education		
	Total	LT $35K	$35K- LT $50K	$50K- LT $75K	$75K- LT $100K	$100K Or More	1	2	3 Or More	None	Any	Under 13	13- 17	HS Grad or less	Coll Incom- plete	Coll Grad
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)
Unweighted Total	505	157	74	92	62	120	85	216	204	376	129	101	52	155	133	217
Weighted Total	504	170	76*	93*	58*	107	83*	206	216	372	133	101*	55*	213	111	181
Can tell from label (Net)	472	155	67	90	56	104	79	190	202	345	127	97	51	191	110	171
	94%	91%	88%	97%C	96%	97%C	95%	92%	94%	93%	95%	96%	94%	90%	99%NP	95%
15g	7	5	2	0	1	0	1	3	3	7	1	1	0	6	1	1
	1%	3%	3%	0	1%	0	1%	2%	1%	2%	*	1%	0	3%	1%	*
20g	26	4	6	4	6	5	7	4	14	15	11	9	9	12	4	11
	5%	3%	8%	5%	11%B	4%	9%H	2%	7%H	4%	8%	9%	16%	5%	3%	6%
35g	325	110	42	62	38	73	57	127	141	239	86	68	31	127	77	121
	65%	65%	55%	67%	66%	68%	69%	62%	65%	64%	65%	67%	57%	60%	70%	67%
55g	114	36	17	24	11	26	13	56	44	85	29	19	11	46	28	39
	23%	21%	23%	25%	19%	24%	16%	27%	20%	23%	22%	19%	21%	22%	25%	22%
I can't tell from this label	13	4	5	1	0	3	0	9	5	9	4	2	3	8	0	5
	3%	2%	7%D	1%	0	3%	0	4%	2%	3%	3%	2%	6%	4%	0	3%
I don't know	19	11	4	2	2	0	4	7	8	17	2	2	0	14	1	4
	4%	6%F	5%F	2%	4%F	0	5%	3%	4%	5%	2%	2%	0	7%O	1%	2%

Proportions/Means: Columns Tested (5% risk level) - B/C/D/E/F - G/H/I - J/K - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N6

Eating one serving of this food item provides how much of your recommended daily limit of saturated fat?

Base = Saw Label S

		Sex		Age						Region				Race		
	Total (A)	Male (B)	Fe-male (C)	18-24 (D)	25-34 (E)	35-44 (F)	45-54 (G)	55-64 (H)	65+ (I)	North-east (J)	Mid-west (K)	South (L)	West (M)	White Only (Non-Hisp) (N)	Black Only (Non-Hisp) (O)	His-panic (Any Race) (P)
Unweighted Total	504	244	260	53	106	70	103	86	86	92	109	186	117	361	44	56
Weighted Total	504	232	272	70*	89*	81*	91*	81*	90*	89*	116*	187	111*	311	68*	86*
Can tell from label (Net)	452	201	250	64	75	73	83	74	83	79	103	170	100	276	60	81
	90%	87%	92%	91%	84%	91%	90%	91%	92%	89%	88%	91%	90%	89%	88%	95%
1%	37	15	21	3	7	2	8	9	8	11	5	15	6	19	8	9
	7%	7%	8%	4%	7%	2%	9%	11%F	9%	12%K	4%	8%	6%	6%	12%	10%
5%	381	172	209	55	59	64	70	61	73	60	95	137	89	244	48	61
	76%	74%	77%	78%	66%	79%	77%	75%	80%E	68%	82%J	73%	80%	78%	70%	71%
12%	23	9	14	1	5	7	4	4	2	5	3	9	5	11	3	5
	4%	4%	5%	1%	6%	8%	5%	4%	2%	6%	3%	5%	4%	4%	4%	6%
50%	11	5	6	6	4	1	0	0	0	2	0	9	0	2	1	6
	2%	2%	2%	8%GHI	5%G	2%	0	0	0	3%	0	5%KM	0	1%	2%	7%N
I can't tell from this label	24	15	9	1	7	2	6	4	3	5	7	7	6	18	2	1
	5%	6%	3%	1%	8%	3%	7%	5%	4%	5%	6%	4%	5%	6%	3%	1%
I don't know	28	15	13	5	8	5	2	4	4	5	7	10	6	17	6	3
	6%	7%	5%	8%	8%	6%	3%	4%	5%	6%	6%	5%	5%	5%	9%	4%

Proportions/Means: Columns Tested (5% risk level) - B/C - D/E/F/G/H/I - J/K/L/M - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N6

Eating one serving of this food item provides how much of your recommended daily limit of saturated fat?

Base = Saw Label S

		Household Income					H.H. Size			Children In H.H.				Education		
	Total	LT $35K	$35K- LT $50K	$50K- LT $75K	$75K- LT $100K	$100K Or More	1	2	3 Or More	None	Any	Under 13	13- 17	HS Grad or less	Coll Incom- plete	Coll Grad
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)
Unweighted Total	504	160	69	89	70	116	84	208	212	355	149	109	70	150	136	218
Weighted Total	504	178	72*	87*	63*	103	88*	191	225	348	156	113*	77*	213	113	178
Can tell from label (Net)	452	158	64	80	61	88	82	172	198	313	138	99	71	183	108	160
	90%	89%	89%	92%	96%F	86%	92%	90%	88%	90%	89%	87%	92%	86%	96%N	90%
1%	37	20	3	4	4	5	6	14	17	27	10	7	5	22	9	6
	7%	11%	4%	5%	6%	5%	7%	7%	8%	8%	7%	7%	7%	10%P	8%	4%
5%	381	129	54	71	49	78	73	150	158	274	107	73	56	150	92	139
	76%	72%	75%	81%	78%	76%	83%	78%	71%	79%K	69%	65%	72%	70%	82%N	78%
12%	23	7	5	3	5	3	2	4	16	8	14	12	8	7	7	8
	4%	4%	7%	3%	8%	3%	3%	2%	7%H	2%	9%J	10%	10%	3%	7%	4%
50%	11	2	2	3	3	1	0	4	7	5	6	6	2	4	0	7
	2%	1%	3%	3%	4%	1%	0	2%	3%	1%	4%	6%	2%	2%	0	4%O
I can't tell from this label	24	7	3	5	1	8	2	8	14	16	8	5	2	12	2	9
	5%	4%	5%	5%	1%	8%	2%	4%	6%	5%	5%	5%	3%	6%	2%	5%
I don't know	28	13	5	2	2	7	5	11	12	18	10	9	4	18	2	8
	6%	7%	7%	3%	3%	7%	5%	6%	6%	5%	7%	8%	5%	8%O	2%	5%

Proportions/Means: Columns Tested (5% risk level) - B/C/D/E/F - G/H/I - J/K - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N6

Eating one serving of this food item provides how much of your recommended daily limit of saturated fat?

Base = Saw Label W

		Sex		Age						Region				Race		
	Total (A)	Male (B)	Female (C)	18-24 (D)	25-34 (E)	35-44 (F)	45-54 (G)	55-64 (H)	65+ (I)	Northeast (J)	Midwest (K)	South (L)	West (M)	White Only (Non-Hisp) (N)	Black Only (Non-Hisp) (O)	Hispanic (Any Race) (P)
Unweighted Total	504	261	243	48	98	75	101	89	93	96	91	195	122	365	40	55
Weighted Total	504	258	246	62*	88*	90*	94*	81*	90*	90*	100*	189	125	322	56*	84*
Can tell from label (Net)	446	227	219	53	82	81	87	69	75	81	90	167	109	283	52	80
	89%	88%	89%	87%	93%I	90%	93%I	85%	82%	89%	90%	88%	87%	88%	94%	95%
1%	44	17	27	3	9	10	11	7	4	10	6	16	12	31	8	4
	9%	7%	11%	5%	11%	11%	11%	8%	4%	11%	6%	9%	9%	10%	14%	5%
5%	349	184	165	32	62	61	70	57	66	63	76	125	84	234	33	58
	69%	71%	67%	52%	71%D	68%	75%D	70%D	73%D	70%	76%	66%	67%	73%	60%	68%
12%	42	21	21	15	2	8	6	5	5	7	7	19	9	16	11	9
	8%	8%	9%	25%EFGHI	3%	9%	6%	6%	6%	8%	7%	10%	7%	5%	20%N	10%
50%	12	5	6	3	7	1	0	0	0	*	1	6	4	2	0	10
	2%	2%	2%	4%	8%GHI	2%	0	0	0	1%	1%	3%	3%	1%	0	12%NO
I can't tell from this label	29	14	15	3	1	2	4	7	11	7	6	10	5	25	0	1
	6%	5%	6%	5%	1%	3%	4%	9%E	12%EF	8%	6%	5%	4%	8%	0	2%
I don't know	29	16	12	5	5	7	3	5	5	2	4	12	11	15	3	3
	6%	6%	5%	8%	6%	7%	3%	6%	5%	2%	4%	6%	9%	5%	6%	3%

Proportions/Means: Columns Tested (5% risk level) - B/C - D/E/F/G/H/I - J/K/L/M - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N6

Eating one serving of this food item provides how much of your recommended daily limit of saturated fat?

Base = Saw Label W

		Household Income					H.H. Size			Children In H.H.				Education		
	Total	LT $35K	$35K- LT $50K	$50K- LT $75K	$75K- LT $100K	$100K Or More	1	2	3 Or More	None	Any	Under 13	13- 17	HS Grad or less	Coll Incom- plete	Coll Grad
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)
Unweighted Total	504	142	81	112	57	112	100	213	191	380	124	95	53	160	129	215
Weighted Total	504	159	79*	112*	56*	98*	99*	202	203	373	132	97*	58*	218	110	177
Can tell from label (Net)	446	144	66	97	48	91	84	177	185	323	123	89	55	196	94	157
	89%	91%	84%	87%	85%	93%	85%	88%	91%	87%	94%J	92%	96%	90%	86%	88%
1%	44	15	6	16	5	2	9	16	19	30	14	11	6	30	7	7
	9%	10%F	7%	15%F	9%F	2%	9%	8%	10%	8%	11%	11%	11%	14%P	6%	4%
5%	349	110	50	73	35	81	60	148	140	262	87	66	35	139	77	133
	69%	69%	63%	65%	62%	82%BCDE	61%	73%G	69%	70%	66%	69%	60%	64%	70%	75%N
12%	42	13	8	5	8	9	15	11	17	26	16	7	12	20	9	14
	8%	8%	10%	4%	14%D	9%	15%H	5%	8%	7%	12%	7%	20%	9%	8%	8%
50%	12	5	3	3	0	0	*	3	8	5	7	5	3	7	2	2
	2%	3%	4%	3%	0	0	1%	1%	4%	1%	5%J	5%	5%	3%	2%	1%
I can't tell from this label	29	3	8	7	6	5	7	13	9	24	5	5	1	7	8	15
	6%	2%	10%B	7%	11%B	5%	7%	7%	4%	6%	4%	5%	3%	3%	7%	8%N
I don't know	29	12	5	7	2	2	7	12	10	26	3	3	1	15	8	6
	6%	8%	6%	7%	3%	2%	7%	6%	5%	7%	2%	3%	1%	7%	7%	3%

Proportions/Means: Columns Tested (5% risk level) - B/C/D/E/F - G/H/I - J/K - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N7

Salt is the main source of sodium in foods. Which description would you prefer on a Nutrition Facts label: 'Salt' or 'Sodium'?

		Sex		Age						Region				Race		
	Total (A)	Male (B)	Female (C)	18-24 (D)	25-34 (E)	35-44 (F)	45-54 (G)	55-64 (H)	65+ (I)	Northeast (J)	Midwest (K)	South (L)	West (M)	White Only (Non-Hisp) (N)	Black Only (Non-Hisp) (O)	Hispanic (Any Race) (P)
Unweighted Total	1008	505	503	101	204	145	204	175	179	188	200	381	239	726	84	111
Weighted Total	1008	490	518	132*	177	171	185	162	181	179	216	376	236	633	124*	170
Have a preference (Net)	712	371	342	106	132	123	133	101	117	114	157	272	169	419	102	132
	71%	76%C	66%	80%HI	75%H	72%	72%	62%	65%	64%	73%	72%J	71%	66%	82%N	77%N
Salt	361	195	165	46	52	70	67	54	72	63	84	139	75	212	62	54
	36%	40%C	32%	35%	30%	41%E	36%	33%	40%	35%	39%	37%	32%	34%	50%NP	32%
Sodium	351	175	176	60	80	53	66	47	45	51	73	134	94	207	40	78
	35%	36%	34%	46%FHI	45%FHI	31%	36%I	29%	25%	28%	34%	36%	40%J	33%	32%	46%N
I don't have a preference	296	119	177	26	45	48	52	61	64	65	59	104	67	214	22	38
	29%	24%	34%B	20%	25%	28%	28%	38%DE	35%D	36%L	27%	28%	29%	34%OP	18%	23%

Proportions/Means: Columns Tested (5% risk level) - B/C - D/E/F/G/H/I - J/K/L/M - N/O/P
Overlap formulae used. * small base

ORC STUDY #809282 ONLINE CARAVAN JULY 10-13, 2014
NUTRITION FACTS-LABEL STUDY

Question N7

Salt is the main source of sodium in foods. Which description would you prefer on a Nutrition Facts label: 'Salt' or 'Sodium'?

		Household Income					H.H. Size			Children In H.H.				Education		
	Total	LT $35K	$35K-LT $50K	$50K-LT $75K	$75K-LT $100K	$100K Or More	1	2	3 Or More	None	Any	Under 13	13-17	HS Grad or less	Coll Incom-plete	Coll Grad
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)
Unweighted Total	1008	302	150	201	127	228	184	421	403	735	273	204	123	310	265	433
Weighted Total	1008	338	150	199	120	201	187	393	428	720	288	210	135	431	222	355
Have a preference (Net)	712	223	113	140	86	150	128	260	324	496	216	167	89	309	152	251
	71%	66%	75%	70%	72%	75%	69%	66%	76%H	69%	75%	79%	66%	72%	68%	71%
Salt	361	125	62	65	40	69	48	152	161	251	109	81	45	184	68	108
	36%	37%	41%	33%	33%	34%	26%	39%G	38%G	35%	38%	39%	34%	43%OP	31%	31%
Sodium	351	98	51	75	46	81	80	108	163	245	106	85	43	125	84	143
	35%	29%	34%	38%	39%	40%B	43%H	28%	38%H	34%	37%	41%	32%	29%	38%N	40%N
I don't have a preference	296	114	38	59	33	51	59	133	104	224	72	43	46	122	71	104
	29%	34%	25%	30%	28%	25%	31%	34%I	24%	31%	25%	21%	34%	28%	32%	29%

Proportions/Means: Columns Tested (5% risk level) - B/C/D/E/F - G/H/I - J/K - N/O/P
Overlap formulae used.

Appendix 2: Center for Science in the Public Interest Consumer Surveys (2015)

On another subject . . .

D1 How many grams of sugar are there in one teaspoon, or don't you know? [Please enter a number from 0-99]

Results: More than half of all respondents answered that they did not know how many grams were in a teaspoon of sugar. Of those that thought they did know, 62% were wrong. Only 18% of total respondents correctly identified 4 grams in a teaspoon of sugar.

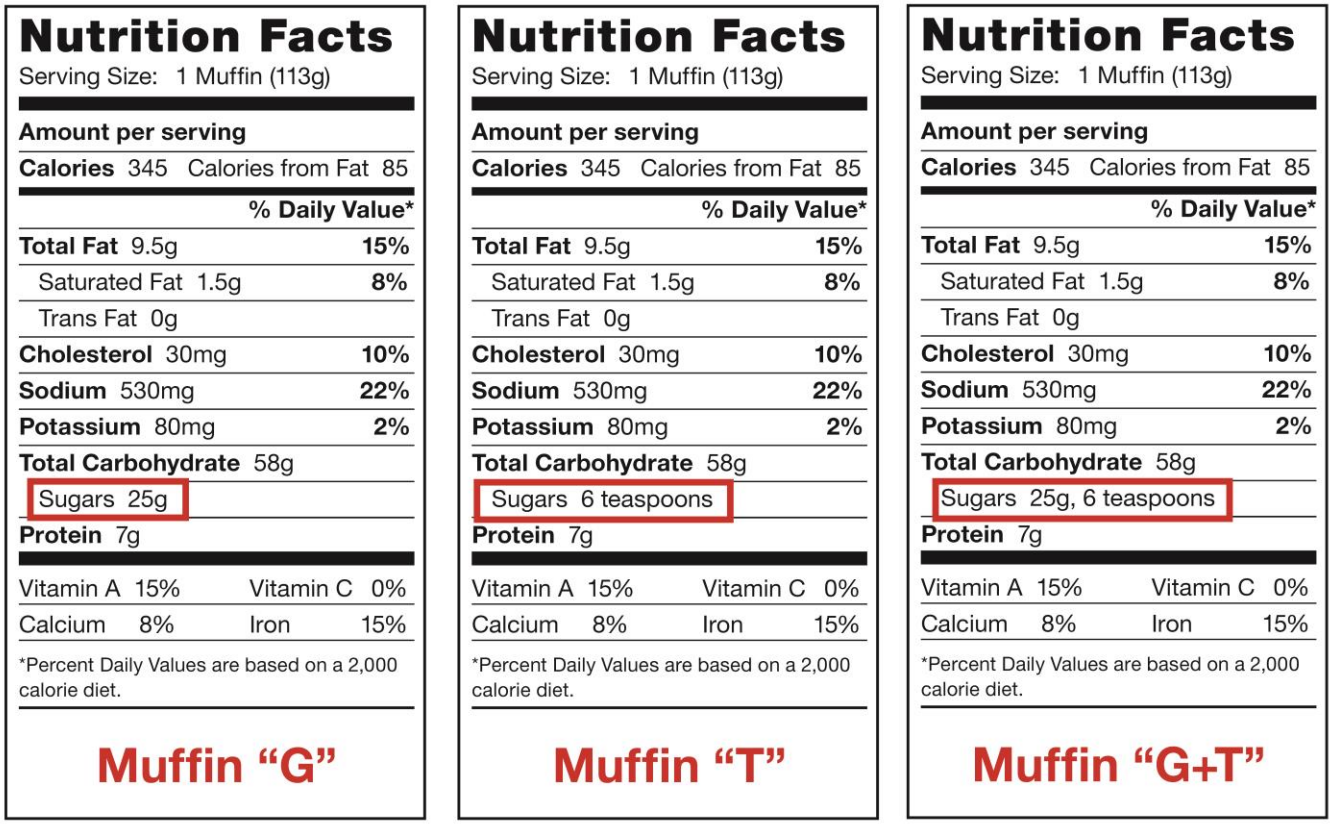
D2 Let's say that the nutrition label on a particular beverage states that it has 40 grams of sugars in a 12-ounce serving. Please estimate how many teaspoons of sugar that would be. [Please enter a number from 0-99]

Results: 40% of respondents answered "don't know." Of those who gave an answer, 70% answered wrong. Only 18% of total respondents correctly identified 10 teaspoons in 40 grams of sugar.

D3 Which version of the nutrition label on a beverage more clearly conveys to you the amount of sugar in a 20-ounce bottle? [Select one answer]

Results: 61% of respondents prefer sugars labeled in teaspoons, 28% preferred grams. 11% had no preference.

D4 Which version of the nutrition label on a muffin package most clearly conveys to you the amount of sugar in the product? [Select one answer]



Nutrition Facts
Serving Size: 1 Muffin (113g)

Amount per serving	
Calories 345	Calories from Fat 85
	% Daily Value*
Total Fat 9.5g	**15%**
Saturated Fat 1.5g	**8%**
Trans Fat 0g	
Cholesterol 30mg	**10%**
Sodium 530mg	**22%**
Potassium 80mg	**2%**
Total Carbohydrate 58g	
Sugars 25g	
Protein 7g	
Vitamin A 15%	Vitamin C 0%
Calcium 8%	Iron 15%

*Percent Daily Values are based on a 2,000 calorie diet.

Muffin "G"

Nutrition Facts
Serving Size: 1 Muffin (113g)

Amount per serving	
Calories 345	Calories from Fat 85
	% Daily Value*
Total Fat 9.5g	**15%**
Saturated Fat 1.5g	**8%**
Trans Fat 0g	
Cholesterol 30mg	**10%**
Sodium 530mg	**22%**
Potassium 80mg	**2%**
Total Carbohydrate 58g	
Sugars 6 teaspoons	
Protein 7g	
Vitamin A 15%	Vitamin C 0%
Calcium 8%	Iron 15%

*Percent Daily Values are based on a 2,000 calorie diet.

Muffin "T"

Nutrition Facts
Serving Size: 1 Muffin (113g)

Amount per serving	
Calories 345	Calories from Fat 85
	% Daily Value*
Total Fat 9.5g	**15%**
Saturated Fat 1.5g	**8%**
Trans Fat 0g	
Cholesterol 30mg	**10%**
Sodium 530mg	**22%**
Potassium 80mg	**2%**
Total Carbohydrate 58g	
Sugars 25g, 6 teaspoons	
Protein 7g	
Vitamin A 15%	Vitamin C 0%
Calcium 8%	Iron 15%

*Percent Daily Values are based on a 2,000 calorie diet.

Muffin "G+T"

Results: 61% of respondents prefer the sugar label in grams *and* teaspoons (Muffin G+T). 18% preferred teaspoons only, and 14% of respondents preferred grams only.

D5 Which one of these labels on a soft drink would make it easier for you to determine whether drinking one bottle would fit into a healthy daily diet? [Select one answer]

Label A.

Nutrition Facts

Serving Size: 1 20-oz bottle

Amount per serving

Calories 250

	% Daily Value*
Total Fat 0g	**0%**
Sodium 0mg	**0%**
Total Carbohydrate	
Sugars 67g	
Protein 0g	

Not a significant source of calories from fat, saturated fat, trans fat, cholesterol, dietary fiber, vitamin A, vitamin C, calcium and iron.

*Percent Daily Values are based on a 2,000 calorie diet.

Label B.

Nutrition Facts

Serving Size: 1 20-oz bottle

Amount per serving

Calories 250

	% Daily Value*
Total Fat 0g	**0%**
Sodium 0mg	**0%**
Total Carbohydrate	
Sugars 67g	**130%**
Protein 0g	

Not a significant source of calories from fat, saturated fat, trans fat, cholesterol, dietary fiber, vitamin A, vitamin C, calcium and iron.

*Percent Daily Values are based on a 2,000 calorie diet.

Results: 80% of respondents valued having the Daily Value percentage label, 11% preferred the label without the percentage, and 10% answered “don’t know.”

D6 Which one of these labels on a muffin package would better help you determine how many muffins you could eat before you reached the recommended daily limit on sugar? [Select one answer]

Label A.

Nutrition Facts

Serving Size: 1 Muffin (113g)

Amount per serving

Calories 345 Calories from Fat 85

	% Daily Value*
Total Fat 9.5g	**15%**
Saturated Fat 1.5g	**8%**
Trans Fat 0g	
Cholesterol 30mg	**10%**
Sodium 530mg	**22%**
Potassium 80mg	**2%**
Total Carbohydrate 58g	
Sugars 25g	**50%**
Protein 7g	

Vitamin A	15%	Vitamin C	0%
Calcium	8%	Iron	15%

*Percent Daily Values are based on a 2,000 calorie diet.

Label B.

Nutrition Facts

Serving Size: 1 Muffin (113g)

Amount per serving

Calories 345 Calories from Fat 85

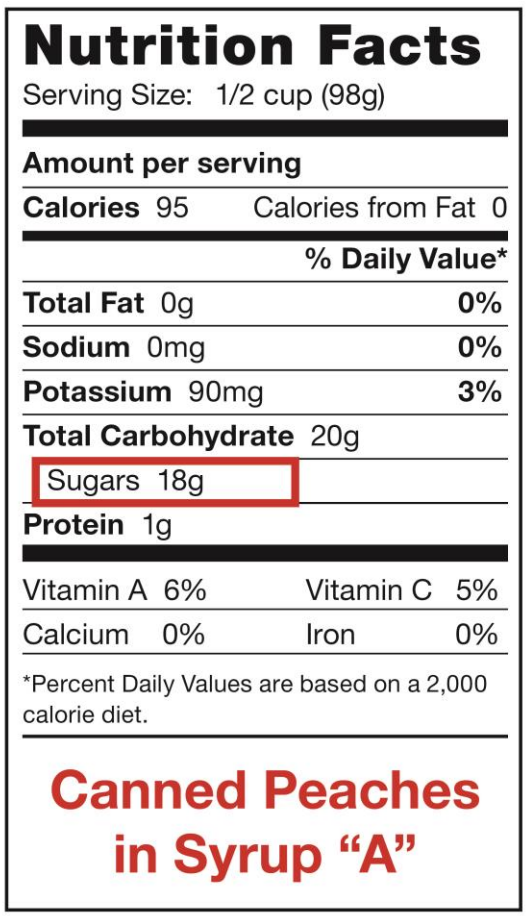
	% Daily Value*
Total Fat 9.5g	**15%**
Saturated Fat 1.5g	**8%**
Trans Fat 0g	
Cholesterol 30mg	**10%**
Sodium 530mg	**22%**
Potassium 80mg	**2%**
Total Carbohydrate 58g	
Sugars 25g	
Protein 7g	

Vitamin A	15%	Vitamin C	0%
Calcium	8%	Iron	15%

*Percent Daily Values are based on a 2,000 calorie diet.

Results: 84% of respondents found Label A with Daily Value amounts to be more helpful (8% preferred the amount in grams only, and 8% didn't know).

D7 Nutrition labels show how much total sugar a serving of food has. However, nutritionists are concerned about the sugar added to foods, not the naturally occurring sugar in foods like peaches or milk. Which of the labels shown would **better** help you choose more healthful foods? [Select one answer]



Results: 83% of respondents said the added sugars label would help them choose more healthful foods (11% preferred the label without added sugars and 6% didn't know).

Appendix 3: Scientific Report of the 2015 Dietary Guidelines Advisory Committee

Table D6.2. Recommendations or statements related to added sugars or sugar-sweetened beverages from international and national organizations

Organization	Recommendation/Statement Related to Added Sugars and/or Sugar-Sweetened Beverages
World Health Organization (WHO)[64]	• WHO recommends reduced intake of free sugars throughout the life-course (*strong recommendation*). • In both adults and children, WHO recommends that intake of free sugars not to exceed 10% of total energy (*strong recommendation*). • WHO suggests further reduction to below 5% of total energy (*conditional recommendation*).
American Heart Association (AHA)[65]	The AHA recommends reductions in added sugars with an upper limit of half of the discretionary calorie allowance that can be accommodated within the appropriate energy intake level needed for a person to achieve or maintain a healthy weight based on the USDA food intake patterns. Most American women should eat or drink no more than 100 calories per day from added sugars (about 6 teaspoons), and most American men should eat or drink no more than 150 calories per day from added sugars (about 9 teaspoons).
HealthyPeople 2020[66]	Objective NWS-17.2: Reduce consumption of calories from added sugars (Target: 10.8%)
American Academy of Pediatrics (AAP)[67-69]	Limit consumption of sugar-sweetened beverages (consistent evidence) Pediatricians should work to eliminate sweetened drinks in schools *Note: Due to limited studies in children, the American Academy of Pediatrics (AAP) has no official recommendations regarding the use of non-caloric sweeteners.*
American Diabetes Association (ADA)[70, 71]	<u>Prevention</u> Research has shown that drinking sugary drinks is linked to type 2 diabetes, and the American Diabetes Association recommends that people limit their intake of sugar-sweetened beverages to help prevent diabetes. <u>Diabetes Management</u> People with diabetes should limit or avoid intake of sugar-sweetened beverages (from any caloric sweetener including high fructose corn syrup and sucrose) to reduce risk for weight gain and worsening of cardiometabolic risk profile. (Evidence rating B)
NHLBI Expert Panel Guidelines for Cardiovascular Health and Risk Reduction in Childhood[72]	Reduced intake of sugar-sweetened beverages is associated with decreased obesity measures (Grade B).

Appendix 4: Recommended Calories by Age and Gender

Recommended Calories* by Age and Gender			DGAC 2015 Maximum Sugar Recommendations	Percent of total calories (based on grams of sugar recommendation)	
Age	Male	Female		Male	Female
2	1000	1000	25g of sugar	10.00%	10.00%
3	1400	1200	25g of sugar	7.14%	8.33%
4	1400	1400	50g of sugar	14.29%	14.29%
5	1400	1400	50g of sugar	14.29%	14.29%
6	1600	1400	50g of sugar	12.50%	14.29%
7	1600	1600	50g of sugar	12.50%	12.50%
8	1600	1600	50g of sugar	12.50%	12.50%
9	1800	1600	50g of sugar	11.11%	12.50%
10	1800	1800	50g of sugar	11.11%	11.11%
11	2000	1800	50g of sugar	10.00%	11.11%
12	2000	2000	50g of sugar	10.00%	10.00%

*Recommended calories based on moderate physical activity. Full recommendations available through:

United States Department of Agriculture. Estimated Calorie Needs per Day by Age, Gender, and Physical Activity. http://www.cnpp.usda.gov/sites/default/files/usda_food_patterns/EstimatedCalorieNeedsPerDayTable.pdf. Accessed September 18, 2015.