January 3, 2011

Commissioner Margaret Hamburg, M.D.
U.S. Food and Drug Administration
10903 New Hampshire Ave.
Silver Spring, MD 20993

Re: Docket No. 2005P-0282

Dear Commissioner Hamburg:

The undersigned scientists, health professionals and organizations are deeply concerned about the harms resulting from the excessive consumption, particularly among youths, of soft drinks with a high content of added sugars. In July 2005, the Center for Science in the Public Interest (CSPI) petitioned the Food and Drug Administration (FDA) to require a series of rotating health messages on soft drinks containing large amounts of high-fructose corn syrup, sugar, and other sweeteners. Sugar-sweetened beverages (SSBs) have been directly linked to obesity, a major contributor to coronary heart disease, stroke, type 2 diabetes, and some forms of cancer. SSBs also cause dental cavities, the most common childhood disease and one that is five times more common than asthma.\(^1\) Placing health messages on SSBs would alert consumers to major health risks and reduce the occurrence of diseases linked to obesity and overweight. To date, despite the urgent need to inform consumers of the hazards of SSBs, the FDA has not taken action on that petition.

Although by no means a cure for America’s obesity problem, warning labels are a standard public health tool that has been effectively used to raise public awareness of the hazards of tobacco use and the excessive consumption of alcoholic beverages. They should be required on all beverages with more than 1.1 grams of sugar, high-fructose corn syrup, or other added caloric sweeteners per ounce.

In one study, each extra soft drink consumed per day was associated with a 60% increased risk of overweight in children.\(^2\) SSBs are the largest single contributor of calories to the diet,\(^3\) providing as much as 10 to 15% of total caloric intake among teenagers.\(^4\) For a moderately active 12-year-old girl, one 12-ounce soft drink represents about 8% of her daily caloric requirements. Those are some of the reasons why the Dietary Guidelines for Americans states “…prospective studies show a positive association between the consumption of calorically sweetened beverages and weight gain. For this reason, decreased intake of such foods,

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especially beverages with caloric sweeteners, is recommended to reduce calorie intake and help achieve recommended nutrient intakes and weight control.”

Over the past several decades, major soft drink companies have steadily increased the sizes of popular single-serving containers—from 6.5 ounces, to 12 ounces, to 20 ounces—in order to encourage ever greater consumption. Because of that, declining relative prices, and the ubiquitous availability, soft drinks have become the most consumed food or beverage in the United States.

High consumption rates among children are especially troubling, with disturbing upward trends continuing from early childhood through adolescence. CSPI estimates that about 20% of one- and two-year old children consume non-diet soda—at an average of seven ounces per day—and that the average 12- to 19-year-old male drinks about 28.5 ounces daily.

In light of the overwhelming evidence linking consumption of soft drinks to serious diseases, consumers deserve to know—and soft drink labels should disclose—the health risks of drinking sugar-sweetened beverages. As CSPI’s petition argues, the Federal Food, Drug and Cosmetic Act (FFDCA) grants the FDA ample legal authority to require health messages on soft drinks containing high-fructose corn syrup, sugar, and other caloric sweeteners. That authority should encourage the FDA to act swiftly on behalf of the public’s health and as part of the government’s response to the obesity epidemic, by labeling soft drinks with health messages. These messages might state such things as:

- The U.S. Government recommends that you drink fewer sugary drinks to prevent weight gain, tooth decay, heart disease and diabetes.
- Drinking too many sugary drinks can promote diabetes and heart disease.
- For better health, the U.S. Government recommends that you limit your consumption of sugary drinks.
- This drink contains 250 calories. Consider switching to water.

We urge the FDA to implement the proposals outlined in CSPI’s July 2005 petition. By alerting Americans to the harmful ingredients of soft drinks and other SSBs, health messages could be an important part of a comprehensive campaign to reduce obesity. Thank you for your consideration of this important matter. We look forward to receiving your response.

Sincerely,

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Organizations

American Association of Public Health Dentistry
American Medical Student Association
American Public Health Association
Berkeley Media Studies Group
Boston Public Health Commission
California Center for Public Health Advocacy
Center for Science in the Public Interest
Central California Regional Obesity Prevention Program
Childhood Obesity Prevention Coalition, WA State
City of El Paso, Department of Public Health
CommonHealth ACTION
Defeat Diabetes Foundation
Fitness Forward
Lifestyle Medicine Institute
Methodist Healthcare Ministries, San Antonio, TX
National WIC Association
New York State Department of Health
Oregon Public Health Institute
Philadelphia Department of Public Health
Public Health Institute, Oakland, CA

Public Health - Seattle and King County, WA
Shape Up America!
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Texas Association of Family & Consumer Sciences
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