

www.coloradohealth.org

October 30, 2017

Food and Drug Administration 10903 New Hampshire Ave Silver Spring, MD 20993

Dear Commissioner Gottlieb:

The Colorado Health Foundation strongly opposes the proposed delay of implementing updates to the Nutrition Facts label. The Colorado Health Foundation is the state's largest private foundation and engages in grantmaking, advocacy and private sector partnerships to advance our vision of bringing health within reach of all Coloradans.

Although Colorado is often touted as the leanest state in the nation, our rates of overweight and obesity have risen dramatically in recent decades. Over half of Colorado adults and a quarter of Colorado's children are overweight or obese. If trends continue, only 33 percent of Colorado adults will be at a healthy weight by 2020. Additionally, according to data from the Colorado Department of Public Health and Environment, obesity disproportionally affects communities of color. American Indian or Alaska Native, black and Hispanic adults have a higher prevalence of obesity². Obesity is a complex problem to address, but finding solutions is imperative for this nation to reduce the \$190.2 billion in annual costs associated with obesity-related illnesses.

As consumers manage their personal health, it is imperative for them to be able to understand the nutritional value of their foods and beverages, including how much added sugars they contain. Extending the implementation deadline for the important updates to the Nutrition Facts panel means that the label will have gone 27 years without major updates. It has already been two years since the final rule was published. Because at least 8,000 products already have the updated Nutrition Facts label, delaying the deadline will create a confusing hodgepodge of nutrition label formats for consumers. The FDA's proposed additions to the nutrition label give consumers vital information to help them make informed decisions about the foods and beverages they include in their diets, and consumers deserve consistent access to this information sooner rather than later.

Given the high rates of diet-related diseases in America and their significant impact on the health of Coloradans, we urge the FDA to act quickly to implement the new Nutrition Facts labels without the proposed delay. We thank you for the opportunity to comment on this proposal. If you have any questions, please do not hesitate to contact Sara Monge, policy officer at the Colorado Health Foundation, at smonge@coloradohealth.org or 303.953.3664.

Sincerely,

Kyle Legleiter

Senior Director of Policy

Kyle Legleiter

The Colorado Health Foundation

¹ https://www.colorado.gov/pacific/sites/default/files/OHE_Health-Disparities-The-2013-Report.pdf

² http://www.chd.dphe.state.co.us/Weight/Obesity-Infographic-Colorado-Data.png