February 13, 2013

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

Dear Dr. Hamburg:

The undersigned scientists and organizations are concerned about Americans’ excess consumption of added sugars and know the Food and Drug Administration and the Department of Health and Human Services are as well. Every edition of the Dietary Guidelines for Americans (going back to 1980) has recommended reducing consumption of added sugars, but Americans are consuming more added sugars (including sucrose, high-fructose corn syrup, corn syrup, and other caloric sweeteners) now than they did in 1980. And that high level of consumption—in everything from sugary drinks and breakfast cereals to baked goods and candy bars—is contributing to serious health problems.

Since publication of the first Dietary Guidelines for Americans, rates of overweight, obesity, and diabetes have soared, and considerable research has demonstrated that sugar-sweetened beverages contribute to those problems.1,2 People who consume more sugary drinks also have higher risks of heart disease3 and gout.4 Furthermore, in the last decade, researchers have found that added sugars, especially the fructose component of sucrose and high-fructose corn syrup, may increase visceral fat, liver fat, blood triglycerides, and small, dense LDL cholesterol, all of which increase the risk of the metabolic syndrome, diabetes, and heart disease.5,6 Consuming large amounts of foods and beverages rich in added sugars either adds excess calories to the diet or displaces nutrient-rich foods from the diet. In particular, sugary foods could displace fruits, vegetables, and other potassium-

1 Hu FB, Malik VS. Sugar-sweetened beverages and risk of obesity and type 2 diabetes: epidemiologic evidence. Physiol Behav. 2010(Apr 26);100(1):47–54.
rich foods that can lower blood pressure or low-fat milk that can strengthen bones.\textsuperscript{7} And, of course, sugary foods also contribute to dental caries.

In view of the evidence that current intakes of added sugars are detrimental to the public’s health, the Dietary Guidelines for Americans and the American Heart Association recommend that a person consuming 2,000 calories per day should consume only about 32 grams, or about 8 teaspoons, of added sugars per day (allowing half of discretionary calories to sugars).\textsuperscript{8} The average American now consumes far more: 18 teaspoons per day according to NHANES studies to the 23 teaspoons per day estimated by the U.S. Department of Agriculture. Upwards of 40 million Americans, especially teenagers and young adults, are getting more than 25 percent of their calories from added sugars.\textsuperscript{9}

The food and beverage industries—manufacturers, restaurants, and supermarkets—market high-sugar foods and beverages aggressively and have made little effort to reduce the sales and/or the sugar content of those products. We have seen the same lack of commitment to reducing sodium intake. Therefore, we urge the FDA to fulfill its responsibility for protecting the public’s health. Just as the Institute of Medicine and state and local health officials have urged regulatory action to lower sodium consumption, we urge the FDA to (a) adopt regulatory and voluntary measures to reduce the amounts of added sugars in beverages to safe levels; (b) encourage industry to voluntarily reduce sugar levels in and the marketing of other high-sugar foods; and (c) mount, perhaps together with the Centers for Disease Control and Prevention and U.S. Department of Agriculture, a high-profile education campaign to encourage consumers to choose lower-sugar or unsweetened foods and beverages. The overall goal should be to decrease the consumption of added sugars to safe, recommended levels over the next several years. We urge you, as commissioner, to give careful consideration to the Citizen Petition on added sugars filed by the Center for Science in the Public Interest.

Sincerely,

Please respond via Michael Jacobson at the Center for Science in the Public Interest in Washington, DC.

PUBLIC HEALTH DEPARTMENTS

Baltimore City Health Department
Baltimore, MD

Boston Public Health Commission
Boston, MA

City of El Paso Department of Public Health
El Paso, TX

Cook County Department of Public Health
Oak Forest, IL

Kansas City Health Commission
Kansas City, Missouri

King County Department of Health
Seattle, WA

Los Angeles County Department of Public Health
Los Angeles, CA

Multnomah County Health Department
Portland, OR

Philadelphia Department of Public Health
Philadelphia, PA

Santa Clara County Public Health
San Jose, CA
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<td><strong>American Association for Health Education</strong> Reston, VA</td>
<td><strong>Defeat Diabetes Foundation</strong> Madeira Beach, Florida</td>
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<td><strong>American College of Preventive Medicine</strong> Washington, DC</td>
<td><strong>Illinois Public Health Institute</strong> Chicago, IL</td>
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<td><strong>American Medical Students Association</strong> Sterling, VA</td>
<td><strong>National Association of County and City Health Officials (NACCHO)</strong> Washington, DC</td>
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<td><strong>American Society of Bariatric Physicians</strong> Aurora, CO</td>
<td><strong>National Consumers League</strong> Washington, DC</td>
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<td><strong>Association of Clinicians for the Underserved</strong> McLean, VA</td>
<td><strong>National Physicians Alliance</strong> Washington, DC</td>
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<td><strong>ChangeLab Solutions</strong> Oakland, CA</td>
<td><strong>National WIC Association</strong> Washington, DC</td>
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<td><strong>California Center for Public Health Advocacy</strong> Davis, CA</td>
<td><strong>National Women’s Health Network</strong> Washington, DC</td>
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<td><strong>Center for Global Policy Solutions</strong> Washington, DC</td>
<td><strong>New York Academy of Medicine</strong> New York, NY</td>
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<td><strong>Consumer Federation of America</strong> Washington, DC</td>
<td><strong>Oral Health America</strong> Chicago, IL</td>
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<td><strong>Prevention Institute</strong> Oakland, CA</td>
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<td><strong>Shape Up America!</strong> Washington, DC</td>
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