



December 15, 2010

Division of Dockets Management
Food and Drug Administration
Department of Health and Human Services
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: Docket ID – FDA – 2010-P-0491-0001, Corn Refiners Petition Citizen Petition to request the Commissioner of Food and Drugs to: Revise Generally Recognized as Safe (GRAS) Affirmation Regulation for High Fructose Corn Syrup to Recognize “Corn Sugar” as an Alternate Common or Usual Name for High Fructose Corn Syrup

To Whom It May Concern:

The National Corn Growers Association (NCGA) is pleased to express our support for the Citizens Petition filed with the Food and Drug Administration (FDA) by the Corn Refiners Association requesting approval for food and beverage manufacturers to have the option of using “corn sugar” as an alternate ingredient for high fructose corn syrup (HFCS) on product labels. Given that high fructose corn syrup production consumes an estimated 460 million bushels of corn annually, our members are very supportive of efforts to ensure that consumers are provided with accurate, objective and complete information on this widely used ingredient.

Founded in 1957, NCGA represents approximately 35,000 dues-paying corn growers and the interests of more than 300,000 farmers who contribute through their state corn check-off programs. NCGA and its 48 affiliated state associations and check-off organizations work together to help protect and advance corn grower’s interest.

In our view, the continued dissemination of misleading information and reports based on flawed science call for action by the FDA to help eliminate the confusion regarding the safety of high fructose corn syrup. Unfortunately, the consumer has been subjected to various groups’ claims that high fructose corn syrup is largely responsible for obesity, diabetes and other health problems. In response to these misrepresentations of recent studies and distortions in fact and science, some companies are pursuing a marketing opportunity to differentiate themselves from their competitors by eliminating high fructose corn syrup as an ingredient in their products or ceasing to offer food or beverages with high fructose corn syrup. NCGA would argue that these reactions to erroneous information and myths about the composition of high fructose corn syrup is likely to result in higher costs to consumers and an unnecessary adverse impact on farmers and the corn industry. As Dr. David Ludwig of the Harvard Medical School so succinctly summarized this opportunism in September of 2009, “The decision to switch from HFCS to cane sugar is 100 % marketing and 0 % science.”

Permitting use of the term “corn sugar” on labels will allow manufacturers to more clearly describe high fructose corn syrup as a natural ingredient, nutritionally equivalent to sugar. Any suggestion that sugar derived from corn and cane sugar are not nutritionally the same has been refuted by multiple experts. The American Dietetic Association is on record stating that “Both sweeteners contain the same number of calories (4 per gram) and consist of equal



parts of fructose and glucose. Once absorbed into the bloodstream, the two sweeteners are indistinguishable." Earlier this year, Dr. Marion Nestle, Paulette Goddard of Professor of Nutrition, Food Studies and Public Health, New York University, concurred that there is no nutritional difference between high fructose corn syrup and sugar.

In conclusion, NCGA strongly urges the Food and Drug Administration to approve the above Citizens Petition as an essential step toward further ensuring that consumers are provided clear and accurate food and beverage label information.

NCGA appreciates your careful consideration of these comments.

Sincerely,

A handwritten signature in black ink, which appears to read "Bart Schott". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Bart Schott, President
National Corn Growers Association