



Consumer Federation of America

February 23, 2011

Dockets Management
Food and Drug Administration
5630 Fishers Lane Room 1061 HFA-305
Rockville, MD 20852

Re: Docket No. FDA-2010-P-0491

The Consumer Federation of America (CFA) appreciates the opportunity to comment on the petition of the Corn Refiners Association to permit “corn sugar” as an alternate name for high fructose corn syrup (HFCS). (**Docket No. FDA-2010-P-0491**). CFA opposes the petition.

The Corn Refiners Association (CRA) petition to rename high fructose corn syrup comes after a decline in consumer acceptance of the sweetener and the subsequent decision of a number of large food and beverage companies to replace HFCS with table sugar in some of their products. Rather than trying to address issues of consumer confusion as CRA purports, the petition appears to be an attempt to address a decline in market share through a regulatory name change.

The term “high fructose corn syrup” has been in common use since FDA’s original GRAS affirmation regulation in 1983. Consumers have seen the term on countless food packages and are aware of it. A change to the term “corn sugar” would only serve to mislead consumers into thinking that the product did not contain HFCS. The FDA already defines “corn sugar” as dextrose. Use of the term “corn sugar” to define HFCS may not, in fact, “more accurately describe the basic nature of the ingredient and its characterizing properties,” as claimed in the CRA petition. Nutrition experts have suggested other terms that may more accurately describe the actual properties of HFCS, such as “corn glucose and fructose syrup”, or “glucose-fructose corn sweetener.”¹

FDA has limited resources and has a significant role to play in the Administration’s efforts to curb obesity and assure the safety of the food supply. The agency should not expend those limited resources on what amounts to an image makeover for a sweetener product and CFA urges the Food and Drug Administration to reject the CRA petition.

Sincerely,

Chris Waldrop
Director, Food Policy Institute

¹ <http://well.blogs.nytimes.com/2010/09/23/help-rename-high-fructose-corn-syrup/>