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Dockets Management Staff (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852

RE: Docket Number FDA-2018-D-0075

This comment letter requests that FDA consider alternatives to the draft guidance referenced above. Producers of maple syrup and honey products in the State of Maine are concerned that the terminology “added sugar” creates a misleading impression when added to labels on their single ingredient maple syrup and honey products.

Maple syrup and honey are two significant State of Maine agricultural commodities. The \$15 million farm gate value of Maine maple syrup has a multiplied impact on the local, rural economy when sold as a value added, pure, unadulterated product. Usage of an “added sugars” label will likely lead consumers to believe that maple products are not pure, natural products.

Honey is a critical cash generating product of the very expensive and necessary pollination service to the native wild blueberry, Maine’s third most valuable agricultural sector. Many small and family sized producers derive a portion of their farm income from local honey and maple syrup and are experiencing growth in sales as consumers seek new unadulterated, natural sweeteners.

While we understand and appreciate FDA’s efforts to address current confusion regarding the “added sugar” labeling requirements for maple syrup and honey, we believe the proposed enforcement discretion guidance does not alleviate the issue. The addition of yet another line (with the newly proposed symbol), seems to be unnecessary. The current labels, which clearly note grams of sugar per serving, provide consumers with the information they need to make informed dietary decisions. For pure, single ingredient, unadulterated product, that should be sufficient and no other notations are needed to be honest and accurate.

We urge FDA to consider revising the draft guidance document to state that a “total grams of sugar per serving” is acceptable for labeling pure maple syrup and honey. Current labels in Maine (see picture below) contain accurate information regarding sugars and avoid the confusion surrounding a long and involved description of what “added sugar” means. We would prefer to stay focused on enforcing adulteration rules and ensuring that consumers understand the labels in as plain and simple a format as possible.

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Thank you for considering our comments and we look forward to continuing the discussion as you proceed.

Sincerely,



Walter E. Whitcomb
Commissioner

