

**USP Prepared Remarks  
July 26, 2018 Public Meeting  
FDA's Comprehensive, Multi-Year Nutrition Innovation Strategy**

Good morning/afternoon, my name is Kristi Muldoon Jacobs, and I am a Director in the External Affairs Division at the United States Pharmacopeia. I am also a food scientist and toxicologist, with firsthand experience evaluating critical issues associated with ensuring that food is safe and healthful for consumers.

On behalf of USP, I would like to thank the Agency for allocating time for us to offer our thoughts on FDA's Nutrition Innovation Strategy. USP's mission aligns closely with that of FDA— ensuring that safe, quality food ingredients are available, along with adequate information for informed decision-making by manufacturers, suppliers, and consumers.

USP is an independent, scientific, nonprofit public health organization devoted to improving health through the development of public quality standards for medicines, foods and dietary supplements. These standards are developed through an open, transparent process that relies on the strong collaboration and commitment of FDA, industry, and the public.

All elements of food safety are essential to public health, as demonstrated by recent events. Consumers deserve access to authentic, safe, quality foods, free from microbial contamination and access to reliable information that enables healthy choices. We applaud and support FDA's efforts around consumer safety, transparency, and consumer choice, as expressed in FDA's Policy Roadmap and Nutrition Innovation Strategy. Our comments today focus on FDA's interest in standards of identity. Specifically, their role in helping establish that food ingredients are, in fact, what they are represented to be—thereby enabling consumers and manufacturers to make informed choices. In an increasingly global supply chain, standards serve as benchmarks for quality and purity that apply to food ingredients, regardless of their origin.

USP shares FDA's dedication to innovation and sound scientific decision-making to advance public health in the foods space. Standards of identity and quality that are relevant and continually maintained help support industry advances by reflecting the latest developments in science and industry. We commit to working with FDA, industry, and the public to help achieve this important objective.

Standardization also provides benefits in the naming context. The ingredient name and label are connected components in achieving quality. Monographs link the standardized plain language name with key identity and quality attributes. The basic principle behind this system is that ingredients that share the same identity, also share the same standard name.

In the absence of a commonly accepted name and standard it is difficult to ensure that an ingredient is what it claims to be—for example ingredients such as sugar, honey and olive oil can vary in identity, causing confusion for consumers.

Thank you for the opportunity to comment. Consistent with our shared public health mission, USP stands ready to continue this dialogue with FDA and industry, and seeks to do this in a way that will have the greatest impact.