



Vermont Maple Sugar Makers' Association

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July 12, 2025

Dr. Claudine Kavanaugh
Office of Nutrition and Food Labeling
Human Foods Program
Food and Drug Administration
5001 Campus Dr., College Park, MD 20740

Submitted electronically via Federal eRulemaking Portal:

RE: Food Labeling: Front-of-Package Nutrition Labeling to Supplement the Nutrition Facts Label.
(FDA-2024-N-2910)

Dear Dr. Kavanaugh:

The Vermont Maple Sugar Makers' Association (VMSMA) is one of the oldest agricultural associations in the United States, dating back to 1893. For 132 years, VMSMA has been the trade association for Vermont's maple syrup producers and stakeholders. Vermont produces over half of the maple syrup in the United States and leads the way in quality, innovation, efficiency, and forest health. VMSMA represents hundreds of family farmers, many bulk buyers and equipment dealers, and partners with research experts across the country. We respectfully submit the following comments regarding the proposed rule on mandatory front-of-package (FOP) nutrition labeling.

As the FDA is aware, Vermont's maple industry strongly advocated for the removal of the "Added Sugar" line requirement for single-ingredient maple syrup products in the U.S. Food and Drug Administrations (FDA) Nutritional Facts Panel. Our position was formally expressed to the FDA Commissioner and was registered through FDA's related consultation process. We remain concerned that linking maple syrup as a single ingredient sugar to any "Added Sugar" FOP labeling requirement would be misleading to consumers and would ultimately be very damaging to the reputation and to the economic health of the U.S. maple industry. This position is based on input from Vermont's maple producers and VMSMA's partner trade associations as well as industry surveys documenting consumer reactions to the added sugar provision.

We urge the FDA to exempt 100% pure maple syrup, pure maple sugar and pure maple products from any FOP labeling requirements that include terms such as "added sugars," "high in sugar," or any other similar designations. These are minimally processed, single-ingredient foods that are already labeled transparently and do not contain any added sugars.

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Maple syrup and other pure maple products are made exclusively by concentrating the sap of maple trees through heating and evaporation. **The process involves no added sugars, sweeteners, or additional ingredients.** Labeling these products as containing added sugars, or requiring a front-of-package warning that suggests sugar has been added is not only misleading, but factually incorrect. Such labeling risks confusing consumers and undermining trust in a product that is, by its very nature, pure and unadulterated.

The Nutrition Facts panels on 100% pure maple syrup and pure maple products already clearly disclose the products' naturally occurring sugar content by listing "Total Sugars". This labeling is straightforward, accurate, and consistent with the FDA's objective of providing consumers with meaningful and transparent nutritional information.

VMSMA appreciates the FDA's efforts to improve consumer nutrition awareness through FOP labelling. However, we are concerned that requiring the % Daily Value (%DV) and interpretive labels (e.g., "High") for added sugars on single-ingredient products like pure maple syrup could mislead consumers. Although the 2018 Farm Bill exempts pure maple syrup from declaring gram amounts of "added sugars" on the Nutrition Facts label, the proposed FOP rule may still require %DV and interpretive labels, implying added sugars where none exist.

The National Honey Board (NHB) submitted studies in its 2018 comment (<https://www.regulations.gov/comment/FDA-2018-D-0075-3547>) on the FDA's "added sugars" labeling rule, showing that mandatory "added sugar" declarations on single-ingredient products like honey (and similarly, maple syrup) cause significant consumer confusion and reduce overall purchases. These findings highlight the risk of misleading consumers with FOP labels indicating "added sugars" on pure products.

These various NHB studies, detailed in the [2018 comment](#), confirm that **"added sugar" labels erode consumer trust** in the purity of single-ingredient products and **reduce purchase intent**. This evidence underscores the need for exemptions for products like honey and pure maple syrup in the FOP rule to prevent consumer confusion and avoid economic harm to producers.

The FDA's front-of-package (FOP) labeling rule aims to guide consumers toward healthier dietary choices by highlighting added sugars, saturated fats, and sodium in processed, multi-ingredient foods. However, **applying "added sugar" labels to single-ingredient, minimally processed products like pure maple syrup undermines the rule's scientific credibility** and misleads consumers. Scientific evidence supports distinguishing natural sugars from added sugars. Maple syrup's sugars, like lactose in milk or fructose in fruit, are inherent to the product, not added during processing.

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FOP labels should reflect meaningful differences in food processing and composition. Labeling pure maple syrup, a natural product, with the same “High” added sugar icon as sodas or sugary cereals blurs these distinctions, confusing health-conscious consumers who rely on labels for quick decisions. The Dietary Guidelines for Americans emphasize whole foods, yet FOP labeling risks penalizing natural products unfairly.

Misleading labels reduce consumer trust in the entire FOP system. If labels seem inaccurate, consumers may disregard them, undermining public health goals. Exempting single-ingredient natural foods like maple syrup ensures scientific accuracy and maintains consumer confidence in the FOP labeling system.

The vast majority of maple syrup producers in the United States are **small-scale, family-run operations** running innovative, efficient operations that preserve the health of Vermont’s forests and are based in Vermont’s heritage and tradition of maple production. Imposing additional FOP labeling requirements, based on a mischaracterization of pure maple syrup as containing added sugars, places an undue burden on these producers. It risks causing **disproportionate economic harm** to a sector that operates with minimal processing and strong consumer trust.

In 2022, Health Canada introduced mandatory front-of-package labelling for foods high in sodium, sugars, and saturated fats. However, 100% maple syrup and pure maple products were explicitly exempted. Canada's rationale included:

- Maple syrup is a **single-ingredient product with no added sugars**.
- Labelling it as “high in sugar” would be **misleading**.
- Consumers already understand its composition and use it in **measured, intentional quantities**.
- It is a **cultural and agricultural heritage product** with economic importance for rural communities.

The FDA has the opportunity to align with international best practices and avoid creating regulatory inconsistency across North American markets. Canada’s exemption of 100% maple syrup and maple products from its FOP warning symbol regulation should serve as a clear precedent. It reflects the same public interest goals and scientific reasoning that this FDA rule aims to achieve, **without misleading consumers about traditional, single-ingredient foods**.

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Conclusion and Recommendation

Analysis of studies conducted by the National Honey Board clearly demonstrate that the FDA's mandated Added Sugar declaration, be it on the nutrition facts panel, or on FOP labels would create consumer confusion and actually erode consumer confidence regarding the purity of single-ingredient pure maple and honey products. We strongly support FDA's efforts to enhance nutritional transparency and empower consumers. However, we respectfully request that the FDA:

- 1) **Exempt pure maple syrup and pure maple products from FOP** "added sugar" or "high in sugar" labeling, and
- 2) **Recognize these products as single-ingredient foods** with naturally occurring sugars, consistent with existing labeling definitions and international precedent.

We welcome the opportunity to engage further with FDA staff on this topic and offer industry-specific insights as the rulemaking process advances.

Thank you,

Allison Hope

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