

Citizen Petition

2 April 2020

The undersigned (“petitioner”) submits this petition under 21 USC §343(q) of the Federal Food, Drug, and Cosmetic Act and 21 CFR §10.30 to request the Commissioner of Food and Drugs to amend 21 CFR §101.9.

A. Action Requested

The petitioner requests the Commissioner to amend 21 CFR §101.9(d)(7)(i), which reads

The name of each nutrient, as specified in paragraph (c) of this section, shall be given in a column and followed immediately by the quantitative amount by weight for that nutrient appended with a “g” for grams, “mg” for milligrams, or “mcg” for micrograms as shown in paragraph (d)(12) of this section. The symbol “<” may be used in place of “less than.”

to read

The name of each nutrient, as specified in paragraph (c) of this section, shall be given in a column and followed immediately by the quantitative amount by weight for that nutrient appended with **a space character and** a “g” for grams, “mg” for milligrams, or “mcg” for micrograms as shown in paragraph (d)(12) of this section. The symbol “<” may be used in place of “less than.”

B. Statement of Grounds

All measurements in the International System of Units (SI), also known as the modern metric system, are properly written with the measurement quantity followed by a (non-breaking or hard) space, and then followed by the unit symbol. It is incorrect to write SI measurements without a space separating the quantity and the unit symbol in the same way it would be incorrect to write “twomilligrams” or “2milligrams”, for example. This is corroborated by every international and national standard and guidance, such as the SI Brochure itself,¹ IEEE/ASTM SI 10-2016,² and NIST Special Publication 330.³

Some might claim that there is not enough space in the Nutrition Facts label to accommodate the extra space, but this is easily refuted by the ample evidence provided within 21 CFR §101.9(d)(12) of the various possible designs of the Nutrition Facts label.

C. Environmental Impact

The petitioner claims a categorical exemption from an environmental impact assessment under 21 CFR §25.30 and 21 CFR §25.32.

¹ [SI Brochure: The International System of Units \(SI\)](#). 9th ed., International Bureau of Weights and Measures (BIPM), 2019, p. 149.

² [IEEE/ASTM SI 10-2016 \(Revision of IEEE/ASTM SI 10-2010\): American National Standard for Metric Practice](#). IEEE, 2016.

³ Newell, David B., and Eite Tiesinga. [NIST Special Publication 330: The International System of Units \(SI\)](#), 2019th ed., National Institute of Standards and Technology, 2019, p. 32.

D.Economic Impact

The petitioner will provide an economic impact assessment if the Commissioner deems it necessary for this petition and requires one.

E. Certification

The undersigned certifies, that, to the best knowledge and belief of the undersigned, this petition includes all information and views on which the petition relies, and that it includes representative data and information known to the petitioner which are unfavorable to the petition.

Hopefully,

Varun Chandra

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(b) (6)

[REDACTED]