June 7, 2022

Kyra Lindemann
Head of Corporate Affairs and Communications, North America
Upfield US Inc.
433 Hackensack Avenue
Hackensack, NJ 07601

Re: Docket No. FDA-2019-P-5887

Dear Ms. Lindemann:

Thank you for your citizen petition dated December 13, 2019, under Docket No. FDA-2019-P-5887, requesting that the Food and Drug Administration amend the current standard of identity for margarine (21 CFR 166.110). The purpose of the standards of identity are to protect consumers against economic adulteration and reflect consumers' expectations about food. We may issue and amend standards of identity when doing so would promote honesty and fair dealing in the interest of consumers (21 U.S.C. 341).

The petition proposes to replace the term "plastic form" with an alternate descriptor and states the term "plastic form" only serves to "create consumer misunderstanding that 'plastic' ingredients are used in food" (Petition at page 2). The petition further states the current wording is "causing consumer confusion" (Petition at page 2). The petition also states that amending the margarine standard will "eliminate consumer confusion" as well as "promote honesty and fair dealing in the interest of the consumers" (Petition at page 5).

We find it helpful to have scientific evidence and consumer research data to support any views related to consumer perception, understanding, and expectations when considering requests to amend a current standard of identity. Therefore, to complete our review of your petition, we request that you submit any scientific literature published in peer-reviewed journals, consumer research studies and data, and any other scientific evidence that could support the claims and

statements in the petition to Docket No. FDA-2019-P-5887. We would be happy to set up a call to further discuss, and if you have any questions, please let us know.

Sincerely yours,

Claudine Kavanaugh, PhD, MPH, RD Director
Office of Nutrition
  and Food Labeling
Center for Food Safety
  and Applied Nutrition