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February 17, 2004

Dr. Kathleen Ellwood  
Director, Division of Nutrition Programs and Labeling  
FDA, Center for Food Safety and Applied Nutrition  
Office of Nutritional Products, Labeling and Dietary Supplements  
HF-1-830  
5100 Paint Branch Parkway  
College Park, MD 20740

2003Q-0559:  
Qualified Health Claim

Dear Dr. Ellwood:

The Soyfoods Council appreciates the opportunity to offer additional information related to the petition, *Authorization of a health claim for monounsaturated fatty acids from olive oil and coronary heart disease*, submitted by the North American Olive Oil Association on August 28, 2003.

The Soyfoods Council is a national organization with its mission to increase the national awareness of soyfoods by building the category for mainstream consumers. Our members include large, medium and small soyfood manufacturers in addition to state soybean boards

In its petition, the North American Olive Oil Association provided a compelling case for a qualified health claim for monounsaturated fatty acids (MUFA) and the protection against coronary heart disease. It is well documented that diets rich in MUFA, in particular oleic acid, favorably lower blood and LDL-cholesterol without lowering HDL cholesterol.

While olive oil provides a significant source of MUFA, canola, sunflower and safflower oils provide nearly as high or higher levels of MUFA in the form of oleic acid, and should likewise be able to carry the qualified health claim. Additionally, through traditional breeding methods and biotechnology, new oils are emerging and will soon be available in the marketplace. These oils include mid-oleic and high-oleic soybean oils that contain similar levels of MUFA and, therefore, should also qualify for the claim. We hope that the MUFA claim, if approved, will be allowed for all oils that meet the set criteria to qualify for its use.

The Soyfoods Council appreciates the opportunity to provide our perspective on this important labeling initiative.

Sincerely,  
  
Linda Funk  
Executive Director  
The Soyfoods Council

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