



MAR 2 2004

Linda D. Meyers, Ph.D.
Director
Food and Nutrition Board
Institute of Medicine
National Academy of Sciences
2101 Constitution Avenue
Washington, DC 20418

Dear Dr. Meyers:

We have received a notification under section 304 of the Food and Drug Modernization Act of 1997 (FDAMA) that identifies the following statements from *Dietary reference intakes: Energy, Carbohydrate, Fiber, Fat, Fatty Acids, Cholesterol, Protein and Amino Acids* (Food and Nutrition Board, Institute of Medicine, National Academy of Sciences (NAS), 2002) as authoritative statements:

" α -Linolenic Acid (ALA) AI Summary, Children and Adolescents

AI for Children

4-8 years 0.9 g/day of [ALA]

AI for Boys

9-13 years 1.2 g/day of [ALA]
14-18 years 1.6 g/day of [ALA]

AI for Girls

9-13 years 1.0 g/day of [ALA]
14-18 years 1.1 g/day of [ALA]"

"Because of a lack of evidence for determining the requirement for *n*-3 fatty acids, an AI is set based on the highest medium intake of α -linolenic acid by adults in the United States where a deficiency is basically nonexistent in free-living populations ...and rounding. Small amounts of

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[eicosapentanoic acid (EPA)] and [docosahexaenoic acid (DHA)] can contribute towards reversing an *n*-3 fatty acid deficiency ... EPA and DHA can contribute up to 10 percent of the total *n*-3 fatty acid intake and therefore up to this percent can contribute towards the AI for α -linolenic acid”

“ α -Linolenic Acid AI Summary, Adults 19 Years and Older

AI for Men

19-30 years	1.6 g/day of [ALA]
31-50 years	1.6 g/day of [ALA]
51-70 years	1.6 g/day of [ALA]
> 70 years	1.6 g/day of [ALA]

AI for Women

19-30 years	1.1 g/day of [ALA]
31-50 years	1.1 g/day of [ALA]
51-70 years	1.1 g/day of [ALA]
> 70 years	1.1 g/day of [ALA]”

These statements appear on page 8-37 and 8-38 of chapter 8 which is titled “Dietary Fats: Total Fat and Fatty Acids.” The statements were included as part of the basis for the following proposed nutrient content claims characterizing the level of ALA, EPA, and DHA in a food or dietary supplement:

high in DHA omega-3
high in ALA omega-3
rich in EPA omega-3
excellent source of DHA omega-3
excellent source of ALA omega-3
contains ALA omega-3
more ALA omega-3
enriched with ALA omega-3
extra ALA omega-3

high in EPA omega-3
rich in DHA omega-3
rich in ALA omega-3
excellent source of EPA omega-3
good source of ALA omega-3
provides ALA omega-3
fortified with ALA omega-3
added ALA omega-3
plus ALA omega-3

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Our review of the notification includes consideration of the NAS policy concerning authoritative statements. We understand that the NAS policy is related only to the determination of identifying a statement as authoritative and not to the evaluation of the wording of the claim itself. With this letter, we are offering the Academy the opportunity, based on its criteria, to elaborate or otherwise comment on the cited claims.

Sincerely,

A handwritten signature in cursive script that reads "Laura Tarantino".

Laura Tarantino
Acting Director
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition