



October 29, 2004

Division of Dockets Management  
Food and Drug Administration  
5630 Fishers Lane, Room 1061 (HFA-305)  
Rockville, MD 20852

Re: Comment on docket 2003Q-0559 (Qualified Health Claim: Monounsaturated Fatty Acids and Reduced Risk of Coronary Heart Disease)

Dear Dockets Management Office:

On behalf of the California Avocado Commission, which represents 6,500 California avocado growers and one of the 20 most commonly consumed fruits in America<sup>1</sup>, please accept these comments 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.

It is well documented that diets rich in monounsaturated fatty acids (MUFAs), in particular oleic acid, favorably lower total and LDL-cholesterol without lowering HDL cholesterol, for protection against coronary heart disease. An analysis of the scientific literature also demonstrates that a lowered risk for coronary heart disease can be achieved by replacing saturated fat in the diet with oils that contain a high percentage of unsaturated fat.

However, it would not be in the interest of public health for FDA to allow a qualified health claim limited to one subset of unsaturated fats (i.e. MUFAs from olive oil), and should instead be expanded to include other sources of unsaturated fats. To have value to the public, any qualified health claim must communicate the message that the benefit to cardiovascular health is available from a number of unsaturated oils, not olive oil exclusively. California avocado is a prime example of a source of unsaturated fat. In fact, eighty-three percent of the fat in California avocado is comprised of unsaturated fatty acids. While olive oil provides a significant source of MUFAs, California avocado contains nearly as much and should likewise be able to carry the qualified health claim.

Precedent exists to approve a qualified health claim applicable to a broader range of foods than that which was originally sought. FDA's approval of a qualified health claim

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<sup>1</sup> Code of Federal Regulations, Title 21: Food and Drugs, 2002. 21CFR101.44 Identification of the 20 most frequently consumed raw fruits, vegetables, and fish in the United States.

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for a broad range of tree nuts and peanuts followed an initial effort to acquire a health claim limited to walnuts.

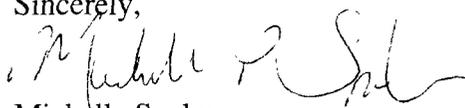
Virtually all dietary guidance documents issued by the U.S. government support substituting unsaturated fat for saturated fat in the diet. The USDA and HHS 2005 *Dietary Guidelines Advisory Committee Report* compiled nine key messages for health, one of which provides direction for fat consumption: "Choose fats wisely for good health." In their report the Committee concluded, "...the evidence is clear that replacing saturated fatty acid calories with MUFAs lowers total and LDL cholesterol levels."

Ample scientific support exists to support the following qualified health claim:

- **Supportive but not conclusive research shows that type of fat (monounsaturated fat) from specific food when substituted for saturated fat may reduce your risk of heart disease as part of a diet low in saturated fat and cholesterol.**

We strongly urge that the MUFA health claim be expanded and allowed for foods such as avocados and oils that meet the criteria to qualify for its use. The establishment of a qualified health claim that will communicate the health benefits of substituting unsaturated fat such as that in avocados, for saturated fat in the diet, is highly appropriate and scientifically defensible.

Sincerely,



Michelle Spelman  
Marketing Director  
California Avocado Commission