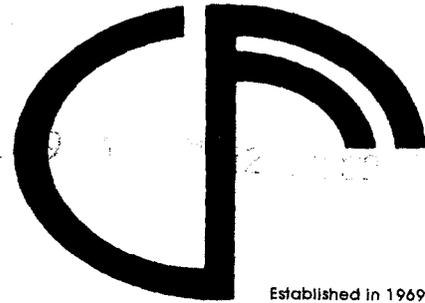


THE CHILDREN'S FOUNDATION
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January 11, 2000

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

RE: Docket Number 94P-0036

We applaud the FDA for its proposal to require "trans" fat labeling and to limit the amount of "trans" fat in foods that make saturated fat, cholesterol, lean, health, and other claims on labels. The scientific evidence clearly demonstrates that "trans" fat raised blood cholesterol levels and heart disease risk. The rule would provide consumers with more complete information about products like margarines, cookies, crackers, snack cakes, French fries, and doughnuts that often contain more heart-unhealthy fats than other labels currently indicate.

We support the FDA's proposal to require that labels include "trans" fat together with saturated fat, with a footnote that indicates the amount of that total that is "trans" fat, for several reasons:

- (1) Labeling "trans" fat together with saturated fat would be less confusing for consumers. A 1995 FDA survey found that only 10% of consumers understand what "trans" fat is. With the proposed label, consumers could continue to look to the saturated fat line of labels but would get more complete information about the heart-unhealthy fats in foods. Well-informed people who are interested in information about "trans" fat could find that information in the footnote.
- (2) Listing saturated and "trans" fat together would make the label easier to use and make it easier to compare products because it would put information about all heart-unhealthy fats in one place on the label. Listing "trans" fat on a separate line would make the label more complicated and harder to use.
- (3) Labeling "trans" fat and saturated fat together would not detract from the saturated fat message. Encouraging the public to cut back on saturated fat is a well-established goal of the Department of Health and Human Services and many health groups. Separate listings might put greater emphasis on "trans" than unsaturated fat.

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(4) The proposed label format would cost less. Under FDA's proposal, foods that have insignificant levels of "trans" would not need to be relabeled.

(5) Labeling "trans" fat together with saturated fat would provide an incentive for manufacturers to reduce both saturated and "trans" fat. If "trans" fat were listed on a separate line, companies might substitute saturated fat for "trans".

We support the FDA's proposal to maintain the current Daily Value(DV) for saturated fat, even though the DV will also include "trans" fat, for several reasons:

(1) Keeping the Daily Value constant might lean Americans to consume less heart-unhealthy fats. The current recommendation -- to consume less than 10% of calories from saturated fat -- is a reasonable target, but lower intakes would be ideal, according to the National Academy of Sciences [Diet and Health Report].

(2) "Trans" fat is already included in the 30% of calories from fat recommendation. It makes the most sense to group "trans" fat with saturated fat rather than with the other unsaturated fats because "trans" fat is functionally and physiologically more similar to saturated fat. The FDA already has excluded "trans" fat from unsaturated fats for labeling purposes.

(3) Raising the DV for saturated fat would be more costly because all food labels would have to be changed.

(4) If the DV for saturated fat were increased, it would make those products that do not have "trans" fat appear healthier, even though their saturated fat content did not change.

We support the FDA's proposal to limit the amount of "trans" fat in foods that make label claims that have limits on saturated fat. Claims that currently have limits on saturated fat are misleading if a product contains significant amounts of "trans" fat, because "trans" also increases the risk of heart disease. It is reasonable for consumers to expect that foods with saturated fat, cholesterol, lean, "made with vegetable oil" and health claims would be low in heart-unhealthy fats. In addition, without a limit on "trans" fat, manufacturers could replace saturated fat with "trans" fat to meet the criteria for a claim.

Again, we commend the FDA for its strong proposal regarding "trans" fat labeling. It will provide Americans with another important tool to help them improve their diets and reduce their risk of heart disease.

Sincerely,



Kay Hollestelle
Executive Director



Facts About The Children's Foundation

URL: www.childrensfoundation.net

The Children's Foundation (CF), a private national educational non-profit organization strives to improve the lives of children and those who care for them. Our mission is to provide a voice for caregivers, children and their families on issues of critical concern. Through the National Child Care Advocacy Program and National Child Support Program, CF conducts research and provides information and training on federal food programs; quality child care; leadership development; health care; and enforcement of court-ordered child support.

IN THE BEGINNING: Two forward-thinking individuals in 1969 founded CF to take a hard look at the problems facing America's poor and hungry families. They decided to concentrate on providing information as a means to solving the inequities in the school lunch and breakfast programs. In 1972, CF led the effort to initiate the WIC program, the most successful food and health care assistance program for low-income mothers and babies.

NATIONAL CHILD CARE ADVOCACY PROGRAM: In 1975 CF was the predominant voice advocating for inclusion of family child care providers in the USDA Child Care Food Program. CF has continuously worked to dispense information to providers about CCFP and to promote the development of sponsoring organizations. As more mothers left their homes to go out to work, issues about day care arrangements, especially family child care, grew. Continuing its work on behalf of providers, CF began to support and empower family child care providers through development of a national network and voice. CF had a prominent role in the creation and development of two national organizations: National CACFP Sponsor's Forum and National Association for Family Child Care. In the 1990's CF has expanded its focus in child care and early childhood education. The National Trainer's Bureau was established offering education and training for parents, nannies, au pairs, child care center staff as well as family child care providers. CF has published a national newsletter, *The CF Child Care Bulletin*, for more than 20 years.

NATIONAL CHILD SUPPORT PROGRAM: In 1983, CF began work in this area as part of a coalition to educate the public and Congress on the need for the Child Support Enforcement Amendments. These efforts were successful and P.L. 98-378 took effect October 1, 1985. CF began publishing the *Child Support Bulletin* in 1986, and continues to provide information to custodial parents, the media, advocates, and Congress. We assist in the establishment of grass roots child support organizations. In the 1990's information and support CF provided to the Florida legislature brought about the transferring of the collection of child support payments from Department of Health and Rehabilitative Services to Department of Revenue.

PUBLICATIONS: CF writes, updates and publishes more than 30 FACT SHEETS on topics and issues related to the National Child Care Advocacy Program and National Child Support Program. Books include: *Better Baby Care: A Book for Family Day Care Providers*, *Better Baby Care: A Training Course for Family Day Care Providers*, *Helping Children Love Themselves and Others: A Professional Handbook for Family Day Care*. Most books and facts sheets are available in Spanish and English. Other resources: *Caring for Infants and Toddlers with Disabilities in Family Child Care: An Annotated Directory* and the companion video, *Yes You Can Do It! Caring for Infants and Toddlers with Disabilities in Family Child Care*.

RESEARCH: CF conducts research annually on the child care regulatory requirements for the 50 States and DC and publishes the *Family Child Care Licensing Study* and *Child Day Care Center Licensing Study*. CF also publishes annually the *National Directory of Family Child Care Associations and Support Groups*.

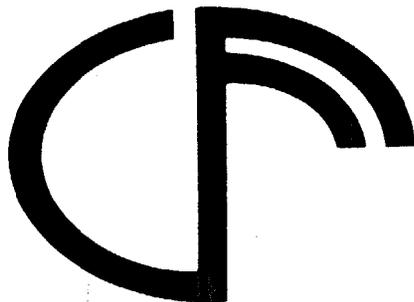
For information about specific services or to obtain a copy of the complete publications list, contact The Children's Foundation, 725 Fifteenth Street, NW, Suite 505, Washington, DC 20005-2109 [Phone: 202-347-3300, Fax: 202-347-3382 or E-Mail: childrensfoundation@erols.com].

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