

MODEL LETTER

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

6001 '00 JAN 13 P3:30

Jan 10, 2000

Re: Docket Number 94P-0036

I 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 raises 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 their labels currently indicate.

1. I 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:

- * Labeling *trans* fat together with saturated fat would be less confusing for consumers. A 1995 FDA survey found that only 10% of consumers appear to 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.
- * 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.
- * 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 saturated fat.
- * The proposed label format would cost less. Under FDA's proposal, foods that have insignificant levels of *trans* would not need to be relabeled.
- * 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*.

94P-0036

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