



**NATIONAL
FISHERIES
INSTITUTE**

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August 19, 2002

Dockets Management Branch
(HFA-305)
Food and Drug Administration (HFS-830)
Room 1061
5630 Fishers Lane
Rockville, MD 20852

RE: Docket No. 01N-0548; Food Labeling; Guidelines for Voluntary Nutrition Labeling of Raw Fruits, Vegetables, and Fish; Identification of the 20 Most Frequently Consumed Raw Fruits, Vegetables, and Fish; Proposed Rule. 67 Federal Register 12918, March 20, 2002.

Dear Sir or Madam:

The National Fisheries Institute (NFI) appreciates the opportunity to submit the following comments in regard to the docket referenced above.

The National Fisheries Institute is the USA's largest non-profit trade association representing all aspects of the fish and seafood industry in the U.S. NFI's mission includes ensuring an ample, sustainable and safe supply of seafood products for American consumers. In light of this mission, we submit the comments herein.

NFI has supported overall FDA's approach to the voluntary nutrition labeling of fish and believes the resulting guidelines provide valuable information to food retailers and, ultimately consumers who use the information to make informed food choices. It has been our pleasure to assist FDA with nutrition and consumption information concerning the top 20 most frequently consumed fish sold at retail. NFI does not have any new data to submit at this time concerning the proposed nutrition values in this Notice but does wish to comment concerning the appropriateness of allowing a statement about trans fats on the fish listed in the guidelines.

Specifically, FDA has requested comments on whether or not fish (cooked without the addition of any ingredients; e.g., fat, breading, or seasoning) contribute a significant amount of *trans* fat. It is our understanding that fish contain only negligible amounts of *trans* fat, or non-detectable levels of *trans* fat. Unlike some animals, fish do not typically accumulate measurable levels of trans fats as a result of their metabolized food sources.

01N-0548

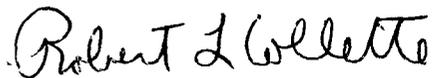
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This would be particularly true of wild-caught fish. NFI believes that a modification similar to that proposed for raw fruits and vegetables should be developed in the regulation for fish. Therefore, proposed new 21 CFR §101.45(a)(3)(iv) should be amended to allow a footnote indicating that fish provide negligible amounts of *trans* fat.

In addition, NFI is aware that the National Food Processors Association has submitted comments to this docket that include a recommendation that the voluntary fish guidelines include an additional listing for Chinook salmon. NFI agrees with NFPA's view that the species merits separate inclusion.

Thank you for the opportunity to comment on this proposed rule.

Sincerely,

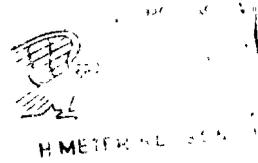
A handwritten signature in black ink that reads "Robert L. Collette". The signature is written in a cursive style with a large initial 'R'.

Robert L. Collette
Vice President of Science and Technology



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