

May 17, 2004

Acting Commissioner Lester Crawford, D.V.M.  
U.S. Food and Drug Administration  
5600 Fishers Lane  
Rockville, MD 20857

Dear Commissioner Crawford:

We, the undersigned researchers and scientists, call on the Food and Drug Administration to prevent the harm caused by the trans fat that Americans are consuming due to the food industry's use of partially hydrogenated vegetable oil. Although saturated fat, cholesterol, and other factors are also major causes of heart disease, we focus now on trans fat because the FDA could largely eliminate it from the food supply easily and quickly.

A clear scientific consensus holds that trans fat raises LDL-cholesterol levels, thereby increasing the risk of heart disease, the leading cause of death in the United States. In addition, the 2000 Dietary Guidelines Advisory Committee, American Heart Association, National Cholesterol Education Program, Institute of Medicine, and Food and Drug Administration have concluded that trans fat lowers HDL-cholesterol, a blood lipid associated with a reduced risk of heart disease. Furthermore, as the FDA has recognized, several prospective cohort studies provide indirect evidence that trans fat may increase the risk of heart disease beyond its impact on cholesterol.

The Institute of Medicine has recommended that consumption of trans be reduced to the greatest extent possible (without undermining the nutritional quality of the diet). Judging from data in FDA's labeling rule, trans fat likely causes upwards of several thousand deaths per year. We support trans-fat labeling, but that measure alone will not achieve the goal of minimizing the consumption of trans fat from the use of partially hydrogenated vegetable oil in packaged foods. Nor will labeling minimize trans fat in restaurant foods, which are not covered by the labeling law and which often contain large amounts of trans fat.

Fortunately, more-healthy alternatives are available for virtually all commercial food applications in which partially hydrogenated vegetable oils are now used. Indeed, in many categories of food (for example, deep-fried restaurant foods, chips, cookies, and crackers), some brands use partially hydrogenated oils, but competing brands use more-healthy oils. Thus, it is practicable, both technologically and economically, for food manufacturers and restaurants to produce foods without partially hydrogenated oils.

We urge the FDA to recognize that partially hydrogenated vegetable oil is not "Generally Recognized As Safe," but a harmful ingredient that should be eliminated as fully and quickly as possible. We urge the FDA promptly to initiate regulatory proceedings to achieve that goal. Simultaneously, the FDA should strongly encourage and assist food processors and restaurants to switch to the most healthy oils possible.

Sincerely,

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Alberto Ascherio, M.D., Dr.P.H.  
Associate Professor of Nutrition and  
Epidemiology  
Departments of Nutrition and Epidemiology  
Harvard School of Public Health  
655 Huntington Avenue, 3rd Floor  
Boston, MA 02115

R. James Barnard, Ph.D.  
Professor of Physiological Science  
UCLA  
Los Angeles, CA 90095

Shirley A.A. Beresford, Ph.D.  
Professor, Epidemiology  
University of Washington  
Seattle, WA 98199

George L. Blackburn, M.D., Ph.D.  
Associate Director  
Division of Nutrition  
Harvard Medical School  
Boston, MA 02115

Henry Blackburn, M.D.  
Division of Epidemiology  
School of Public Health  
University of Minnesota  
1300 Second St. S.  
Minneapolis, MN 55454

T. Colin Campbell, M.D., Ph.D.  
Jacob Gould Schurman Professor of  
Nutrition  
Division of Nutritional Sciences  
Cornell University  
Ithaca, NY 14853

Lilian Cheung, D.Sc., R.D.  
Lecturer, Director of Health Promotion &  
Communication  
Department of Nutrition  
Harvard School of Public Health  
Boston, MA 02115

Caldwell B. Esselstyn, Jr., M.D.  
Head, Thyroid & Parathyroid Surgery  
The Cleveland Clinic Foundation  
9500 Euclid Avenue  
Cleveland, OH 44195

Christopher D. Gardner, Ph.D.  
Assistant Professor of Medicine  
Stanford Prevention Research Center  
Stanford University School of Medicine  
Hoover Pavilion, Room N229  
211 Quarry Road  
Stanford, CA 94305-5705

Matthew W. Gillman, M.D., S.M.  
Associate Professor  
Department of Ambulatory Care and  
Prevention  
Harvard Medical School/Harvard Pilgrim  
Health Care  
133 Brookline Ave., 6th floor  
Boston, MA 02215

Edward Giovannucci, M.D., Sc.D.  
Associate Professor of Nutrition and  
Epidemiology  
Harvard School of Public Health  
665 Huntington Avenue  
Boston MA 02115

Stephen Havas, M.D., M.P.H., M.S.  
Professor of Epidemiology and Preventive  
Medicine  
University of Maryland School of Medicine  
Baltimore, MD 21201

K.C.Hayes D.V.M., Ph.D.  
Professor of Biology (Nutrition) and  
Director, Foster Biomed Research Lab, MS-  
029  
Brandeis University  
Waltham, MA 02454

David Heber, M.D., Ph.D., F.A.C.N.  
Chief, Center for Human Nutrition  
UCLA  
12-217 WH, Mailcode 174222  
Los Angeles, CA 90095-1742

Allan A. Johnson, Ph.D., L.N.  
Professor and Chairman  
Department of Nutritional Sciences  
Howard University  
Washington, DC 20059

Norman Kaplan, M.D.  
Professor, Internal Medicine  
University of Texas Southwestern Medical  
Center at Dallas  
5323 Harry Hines Blvd.  
Dallas, Texas 75390-8899

David L. Katz, M.D., M.P.H., F.A.C.P.M.,  
F.A.C.P.  
Director  
Yale Griffin Prevention Research Center  
130 Division Street  
Derby, CT 06418

Fred A. Kummerow, Ph.D.  
Professor Emeritus  
Food Science & Human Nutrition  
University of Illinois  
Urbana, IL 61801

John C. LaRosa, M.D., F.A.C.P.  
President of SUNY Downstate  
450 Clarkson Ave  
Brooklyn, NY 11203

JoAnn E. Manson, M.D., Dr.P.H.  
Professor of Medicine  
Harvard Medical School  
Chief of Preventive Medicine  
Brigham and Women's Hospital  
3rd Floor, 900 Commonwealth Avenue  
Boston, MA 02215

Martha Clare Morris, Sc.D.

Rush Institute for Healthy Aging  
Rush University Medical Center  
1645 W. Jackson, Suite 675  
Chicago, IL 60612

Marion Nestle, Ph.D., M.P.H.  
Professor and Chair  
Department of Nutrition, Food Studies, &  
Public Health Education  
New York University  
35 W. 4th St., 1210  
New York, New York

Frank M. Sacks, M.D.  
Professor of Cardiovascular Disease  
Prevention  
Nutrition Department  
Harvard School of Public Health  
665 Huntington Ave  
Boston, MA 02115

Jeremiah Stamler, M.D.  
Professor Emeritus  
Northwestern University  
Feinberg School of Medicine  
680 N. Lake Shore, Suite 800  
Chicago, IL 60611-4402

Meir Stampfer, M.D., Dr.P.H.  
Professor of Epidemiology and Nutrition  
Chair, Department of Epidemiology  
Harvard School of Public Health  
Professor of Medicine  
Harvard Medical School  
Boston, MA 02115

Eric J. Topol, M.D.  
Provost, Cleveland Clinic Lerner College of  
Medicine  
Professor of Medicine and Genetics  
Case Western Reserve University  
Chief Academic Officer  
Cleveland Clinic Foundation  
9500 Euclid Avenue, Desk F-25  
Cleveland, OH 44195

Walter Willett, M.D., Dr.P.H.  
Fredrick John Stare Professor of  
Epidemiology and Nutrition  
Departments of Nutrition and Epidemiology  
Harvard School of Public Health  
Building II, Room 311  
651 Huntington Avenue  
Boston, MA 02115

Margo Woods, D.Sc.  
Associate Professor  
Nutrition/Infection Unit  
Tufts University School of Medicine  
150 Harrison Ave., Jaharis 2  
Boston, MA 02111

*Note: Please respond via: Michael Jacobson, CSPI, #300, 1875 Connecticut Ave., Washington,  
DC 20009-5728*