

RECEIVED

2005 AUG 15 A 10: 31

OFFICE OF THE SECRETARY
COMMUNICATIONS CONTROL

July, 18, 2005

Secretary Michael Leavitt
U.S. Department of Health and Human Services
200 Independence Ave. SW
Washington D.C. 20201

Dear Secretary Leavitt:

We would like to comment on a letter addressed to you by a group of health-professionals dated June 1, 2005 related to the use of palm oil. This group argues that consumption of palm oil increases the risk of cardiovascular disease. On this basis, their goal is to request the FDA to encourage US food processors and restaurants to avoid the use of palm oil.

- **Scientific reasons for the lack of consistency in the letter**

The health claims by this group of health-professionals-against-palm-oil are centered on the content of palmitic acid, found in palm oil at a level of 43.5%. However, they do not mention that the same palmitic acid is also present in cocoa butter (25.4%)² main ingredient of chocolate bars, cottonseed oil (22.7%)³ a favorite oil in the American kitchens and an important ingredient in American margarines⁴, in butter (21.3%)⁵ or in beef tallow (24.9%)⁶ which is the fat present in hamburger patties and also it is a favorite deep-fry fat⁷ used by food processors and restaurants in America.

Considering the fact that these fats make a really important contribution to the American diet, why is it that these health-conscious professionals, who consider palmitic acid to be so "harmful", do not show the same degree of concern against cocoa butter, cottonseed oil, butter and tallow as they show against palm oil.

- **Is the letter filed by the experts unbiased?**

In our opinion their public health concern is not unbiased. When referring to palm oil, they insist in using the ill-defined term "tropical oil" which was coined by the American Soybean Association (ASA) in their trade war against palm oil⁸ and which has been ruled out of food labels by the U.S. Federal Trade Commission as illegal⁹. In their letter, they are reenacting ASA's trade war. The suggested substitution of palm oil by alternative liquid oils such as soy, canola and corn oil among others, is impractical when it comes to formulation of plastic fats like margarine and shortening. In order to formulate fats out of liquid oils such as soy or sunflower oil, the processor has to hydrogenate them^{10, 11} hence, a denaturation step of the oil becomes unavoidable. Moreover, in order to avoid generation of trans fatty acids, as a side product of a partial hydrogenation, liquid oils are fully hydrogenated first and then interesterified with more liquid oil^{12, 13}. interesterification is a process whereby an array of unnatural triacyl

P

2003N-0076

C 37

glycerols are created¹⁴. We have not yet a clear picture on the impact that these synthetic fats might have on human nutrition but we know that palm stearine and palm oil can be successfully blended with liquid oils and processed in order to obtain natural plastic shortenings¹⁵ and margarines¹⁶, free of any synthetic product created by chemical manipulation.

- **Support for palm oil posed by many research studies**

The scientific support to the claims against palm oil is primarily based on two meta-analysis studies^{17, 18} which, by their nature, are considered by the scientific community as circumstantial evidence. Apparently, this lobbyists group ignore in their letter the large number of scientific studies which arrive at the exactly opposing results. Palm oil has been a healthy source of edible oil for thousands of years¹⁹, palm oil and its fractions are used all-over the world either as cooking oil or as shortening and margarine ingredient for household and industrial food applications. Easily digested, palm oil plays a critical role as a source of energy and essential fatty acids in many regions around the world²⁰. In a direct comparison against olive oil, canola and peanut oil, palm oil does not raise serum cholesterol levels^{21, 22}. In some studies, plasma cholesterol level was lowered; here, palmitic acid showed to be equivalent to oleic acid on effects on cholesterol metabolism^{23, 24}. Yet in other studies, dietary palmitic acid lowered serum cholesterol and LDL levels as compared to lauric and myristic acids^{25, 26, 27}.

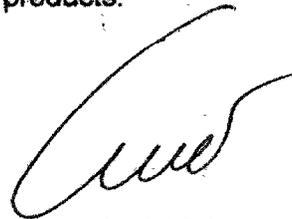
- **Conclusion**

After examining our arguments against those in the above-mentioned letter, you will agree in that it is far more reasonable to urge the HHS and the FDA to encourage food processors to use fully natural oils and fats, containing palm oil or palm fractions instead of chemically manipulated products.

Thank you for your interest in this matter.



Dr. Jorge Román
President of ANCUPA



Econ. José Malo
Presidente of APROGRACEC

Cópia:

Dr. Oswaldo Molestina
Ing. Pablo Rizzo
Dr. Manuel Chiriboga
Ing. Patricio Maldonado

Ministro de Comercio, Industrialización y Pesca
Ministro de Agricultura y Ganadería
Jefe Negociador Agrícola del Ecuador
Presidente de la Cámara de Agricultura I Zona

References

1. USDA, Agricultural Research Service, Nutrient Data Laboratory. *Oil, vegetable, palm*, NDB No.: 04055: <http://www.nal.usda.gov/fnic/foodcomp/search/> (accessed Jul. 8, 2005).
2. USDA, Agricultural Research Service, Nutrient Data Laboratory. *Oil, vegetable, cocoa butter*, NDB No.: 04501: <http://www.nal.usda.gov/fnic/foodcomp/search/> (accessed Jul. 9, 2005).
3. USDA, Agricultural Research Service, Nutrient Data Laboratory. *Oil, vegetable, cottonseed, salad or cooking*, NDB No.: 04502: <http://www.nal.usda.gov/fnic/foodcomp/search/> (accessed Jul. 9, 2005).
4. USDA, Agricultural Research Service, Nutrient Data Laboratory. *Margarine, industrial, non-dairy, cottonseed, soy oil (partially hydrogenated), for flaky pastries*, NDB No.: 04665: <http://www.nal.usda.gov/fnic/foodcomp/search/> (accessed Jul. 9, 2005).
5. USDA, Agricultural Research Service, Nutrient Data Laboratory. *Butter, whipped, with salt*, NDB No.: 01002: <http://www.nal.usda.gov/fnic/foodcomp/search/> (accessed Jul. 9, 2005).
6. USDA, Agricultural Research Service, Nutrient Data Laboratory. *Fat, beef tallow*, NDB No.: 04001: <http://www.nal.usda.gov/fnic/foodcomp/search/> (accessed Jul. 9, 2005).
7. USDA, Agricultural Research Service, Nutrient Data Laboratory. *Shortening frying (heavy duty), beef tallow and cottonseed*, NDB No.: 04550: <http://www.nal.usda.gov/fnic/foodcomp/search/> (accessed Jul. 9, 2005).
8. Klurfeld DM. Tropical oil turmoil. <http://www.unu.edu/unupress/food/8F142e/8F142E0d.htm> (accessed Jul. 9, 2005).
9. Nutrition News Focus. Tropical Oils - PR Mumbo Jumbo. <http://www.nutritionnewsfocus.com/archive/TropOil.html> (accessed Jul. 9, 2005).
10. Moustafa A and Stauffer C. Bakery Fats. *ASA American Soybean Association - USB United Soybean Board.*, Document NH 23 - E -1997: p 13, <http://www.asa-europe.org/pdf/bakery.pdf> (accessed Jul. 9, 2005).
11. Schmidt KM, editor. Sunflower oil processing manual. *The National Sunflower Association.* 1989: 93-124.
12. ASA American Soybean Association. July 9 2003: ASA responds to FDA call for trans fat labelling. <http://www.soygrowers.com/newsroom/releases/2003%20releases/r070903.htm> (accessed Jul. 9, 2005).
13. ASA American Soybean Association. July 2, 2004: ASA urges food companies to use soy-based solutions to trans fats. <http://www.asa-europe.org/pdf/foodcomp.pdf> (accessed Jul. 10, 2005).
14. Haumann BF. Tools: hydrogenation, interesterification. *Inform.* 1994; 5: 672-678.
15. American Palm Oil Council. Bakery shortenings. <http://www.americanpalmoil.com/shortening.html> (accessed Jul. 10, 2005).
16. American Palm Oil Council. Margarine. <http://www.americanpalmoil.com/margarine.html> (accessed Jul. 10, 2005).
17. Clarke R, Frost C, Collins R, et al. Dietary lipids and blood cholesterol: quantitative meta-analysis of metabolic ward studies. *Brit Med J.* 1997; 314: 112-7.
18. Mensink RP, Zock PL, Kester ADM, et al. Effects of dietary fatty acids and carbohydrates on the ratio of serum total to HDL cholesterol and on serum lipids and apolipoproteins: a meta-analysis of 60 controlled studies. *Am J Clin Nutr.* 2003; 77: 1146-55.
19. Cotrell RC. Nutritional aspects of palm oil. *Am J Clin Nutr.* 1991; 53: 989S-1009S.
20. Calloway DH and Kurtz GW. The absorbability of natural and modified fats. *Food Research.* 1956, 21: 621-629.
21. Wood R, Kubena K, Tseng S, Martin G and Crook R. Effect of palm oil, margarine, butter and sunflower oil on the serum lipids and lipoproteins of normocholesterolemic middle-aged men. *J Nutr Biochem.* 1993; 4: 286-297.

22. Ng TKW, Hayes KC, de Witt GF, Jegathesan M, Satgunasingham N, Ong ASH and Tan DTS. Palmitic and oleic acid exert similar effects on serum lipid profile in normocholesterolemic humans. *J Am Coll Nutr.* 1992; 11: 383-390.
23. Hayes KC, Pronczuk A and Koshla P. A rationale for plasma cholesterol modulation by dietary fatty acids: Modelling the human response in animals. *J Nutr Biochem.* 1995; 6: 188-194.
24. Choudhury N, Tan L and Truswell AS. Comparison of palm olein and olive oil: Effects

Aug 17, 2005 11:11:22 WS# 06
OFFICE OF THE SECRETARY
CORRESPONDENCE
CONTROL CENTER

22. Ng TKW, Hayes KC, de Witt GF, Jegathesan M, Satgunasingham N, Ong ASH and Tan DTS. Palmitic and oleic acid exert similar effects on serum lipid profile in normocholesterolemic humans. *J Am Coll Nutr.* 1992; 11: 383-390.
23. Hayes KC, Pronczuk A and Koshla P. A rationale for plasma cholesterol modulation by dietary fatty acids: Modelling the human response in animals. *J Nutr Biochem.* 1995; 6: 188-194.
24. Choudhury N, Tan L and Truswell AS. Comparison of palm olein and olive oil: Effects on plasma lipids and Vitamin E in young adults. *Am J Clin Nutr.* 1995; 61: 1043-1051.
25. Ng TKW, Hassan K, Lim JB, Lye MS and Ishak R. Non-hypercholesterolemic effect of a palm oil diet in Malaysian volunteers. *Am J Clin Nutr.* 1991; 53: 1015s-1020s.
26. Sundram K, Hayes KC and Siru OH. Dietary palmitic acid results in a lower serum cholesterol than a lauric-myristic acid combination in normolipemic humans. *Am J Clin Nutr.* 1994; 59: 841-846.
27. Hayes KC, Pronczuk A, Lindsey S and Diersen-Schade D. Dietary saturated fatty acids (12:0, 14:0, 16:0) differ on their impact on plasma cholesterol and lipoproteins in human primates. *Am J Clin Nutr.* 1991; 53: 491-498.



ASOCIACIÓN NACIONAL DE CULTIVADORES DE PALMA AFRICANA

Antonio Granda Centeno Oe4-225 y Carondelet, telfs.: 2447868, 2459766, fax: 2447867, casilla: 3960,
e-mail: info@ancupa.com, web: www.ancupa.com, Quito-Ecuador.

Secretary Michael Leavitt
U.S. Department of Health and Human
Services
200 Independence Ave. SW
Washington D.C. 20201

*** RECEIVED ***
Aug 17 2006 11:11:22 WS# 06
OFFICE OF THE SECRETARY
CORRESPONDENCE
CONTROL CENTER