



February 17, 2004

Dr. Kathleen Ellwood  
Director, Division of Nutrition Programs and Labeling  
FDA, Center for Food Safety and Applied Nutrition  
Office of Nutritional Products, Labeling and Dietary Supplements  
HFS-830  
5100 Paint Branch Parkway  
College Park, MD 20740

Dear Dr. Ellwood:

The United Soybean Board (USB) appreciates the opportunity to offer additional information related to the petition, *Authorization of a health claim for monounsaturated fatty acids from olive oil and coronary heart disease*, submitted by the North American Olive Oil Association on August 28, 2003.

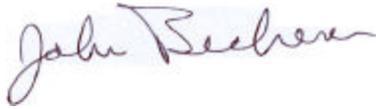
The United Soybean Board, created by the 1990 Farm Bill to manage and direct the National Soybean Checkoff, is dedicated to spreading knowledge and understanding of the soybean. The USB is comprised of 62 volunteer soybean farmers representing the interests of fellow growers nationwide. USB programs help the healthcare, foodservice and food manufacturing industries to better understand and utilize the complex soybean.

In its petition, the North American Olive Oil Association provided a compelling case for a qualified health claim for monounsaturated fatty acids (MUFA) and the protection against coronary heart disease. It is well documented that diets rich in MUFA, in particular oleic acid, favorably lower blood and LDL-cholesterol without lowering HDL cholesterol.

While olive oil provides a significant source of MUFA, canola, sunflower and safflower oils provide nearly as high or higher levels of MUFA in the form of oleic acid, and should likewise be able to carry the qualified health claim. Additionally, through traditional breeding methods and biotechnology, new oils are emerging and will soon be available in the marketplace. These oils include mid-oleic and high-oleic soybean oils that contain similar levels of MUFA and, therefore, should also qualify for the claim. We hope that the MUFA claim, if approved, will be allowed for all oils that meet the set criteria to qualify for its use.

On behalf of the U.S. soybean producers, the United Soybean Board appreciates the opportunity to provide our perspective on this important labeling initiative.

Sincerely,

A handwritten signature in dark ink, reading "John Becherer". The signature is written in a cursive style with a large initial "J".

John Becherer  
CEO  
United Soybean Board