



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 American Soybean Association (ASA) 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. ASA represents 25,000 producer members on national issues of importance to all U.S. soybean farmers.

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.

We appreciate the opportunity to provide our perspective on this important labeling initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Heck", is positioned above the printed name.

Ron Heck
President