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May 3, 2004

Robert E. Brackett, (HFS-001), Director  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
Room 4B064, Harvey W. Wiley Federal Building  
5100 Paint Branch Parkway  
College Park, MD 20740-3835

Re: Nutrient Content and Health Claims for Omega-3 Fatty Acids

Dear Dr. Brackett:

As is one of the nation's largest cancer charities, the American Institute for Cancer Research (AICR) focuses exclusively on the link between diet and cancer, which is why our organization is writing this letter in support of a notification recently filed with the Center for Food Safety and Applied Nutrition to permit nutrient content claims for omega-3 fatty acids.

In 2004, about a third of all cancer deaths will be related to nutrition, overweight or obesity and other lifestyle factors. For this reason, it is more important than ever before for Americans to have helpful information, such as specific nutrient content claims identifying those omega-3 fatty acids, such as DHA (docosahexaenoic acid) and EPA (eicosapentaenoic acid), that have been associated with lower the risk for certain cancers. The evidence is beginning to amass. For example, the newest data showing this positive effect comes from the National University of Singapore, which in a prospective study of more than 35,000 Singapore Chinese women found that those consuming the highest levels of omega-3 fatty acids had a 26 percent lower risk for developing breast cancer than those in the lowest consuming group.

At the same time, AICR and other members of the nutrition community are increasingly concerned that too many Americans are over-consuming omega-6 fatty acids from such sources as margarine and most vegetable oils, baked goods, cereals, eggs, and poultry. Research has shown that omega-6 fatty acids tend to make cells grow larger, which is why *in excess*, omega-6 fatty acids are thought to be cancer promoting.

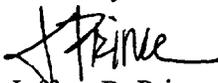
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AICR has learned that a notification was recently filed with CFSAN setting the stage for FDA to permit nutrient content claims for DHA and EPA. The basis for this notice is the findings of the September 2002 report "Dietary Reference Intakes for Energy, Carbohydrate, Fiber, Fat Fatty Acid, Cholesterol, Protein, and Amino Acid" published by the National Academy of Science's Institute of Medicine (IOM). In this report, IOM stated that a growing body of data demonstrates that DHA and EPA can reduce the risk of heart disease.

Because of the added importance of helping Americans to increase their consumption of omega-3 fatty acids while balancing their intake of omega-6's, AICR believes that immediate action to accept this notification will have significance far beyond the realm of heart disease prevention. Therefore, we urge FDA to move quickly to permit nutrient content claims for specific omega-3 fatty acids, which will facilitate the selection of foods containing nutrients that are believed to be protective.

Sincerely,



Jeffrey R. Prince

Vice President

American Institute for Cancer Research

cc:

Dr. Lester M. Crawford (HF-1)

Deputy Commissioner

Food and Drug Administration

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