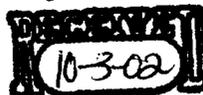


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September 20, 2002

BY EXPRESS MAIL

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Re: Health Claim Petition: Diets Including Walnuts Can Reduce the  
Risk of Heart Disease [Docket # 02P-0292] -- Supplemental  
Studies Published Since

Dear Dr. Adams:

On behalf of petitioner California Walnut Commission ("the Commission"), I am writing to supplement the docket with relevant materials published since the above-referenced health claim petition was submitted on March 15, 2002.

Enclosed at Tab A is Iwamoto, M., et al., "Serum Lipid Profiles in Japanese Women and Men During Consumption of Walnuts," Eur. J. Clin. Nutr. 2002; 56:629-637. The results of this controlled clinical trial, in which a diet including walnuts reduced serum total and LDL cholesterol in Japanese women, are discussed at page 27 of the petition.

Enclosed at Tab B is Albert, C.M., et al., "Nut Consumption and Decreased Risk of Sudden Cardiac Death in the Physicians' Health Study," Arch Intern Med. 2002;162:1382-1387, enclosed at Tab B. In this study, Albert and colleagues examined the associations between nut consumption and risk of sudden cardiac death and other coronary heart disease end points in a cohort of 21,454 U.S. male physicians followed up for an average of 17 years. The results demonstrated that dietary nut intake was associated with a significantly reduced risk of sudden cardiac death after controlling for known cardiac risk factors and other dietary habits. Compared

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Michael A. Adams, Ph.D.  
September 20, 2002  
Page 2

with men who rarely or never consumed nuts, those who consumed nuts two or more times per week had a 47% lower risk of sudden cardiac death and a 30% lower risk of total coronary heart disease death. In contrast, nut intake was not associated with significantly reduced risks of nonsudden coronary heart disease death or nonfatal myocardial infarction. The researchers stated that these results suggest that at least part of the effect of nut consumption on sudden cardiac death may be due to a reduction in fatal ventricular arrhythmias, and noted that the  $\alpha$ -linolenic acid in nuts, particularly walnuts, has been demonstrated to have anti-arrhythmic properties.

Finally, enclosed at Tab C is Kris-Etherton, P.M., et al., "Recent Discoveries in Inclusive Food-based Approaches and Dietary Patterns for Reduction in Risk for Cardiovascular Disease," *Curr. Opin. Lipidol.* 2002;13:397-407. This review discusses new evidence-based dietary recommendations issued by the American Heart Association that are founded on an inclusive food strategy. In discussing nuts, the authors conclude that there is compelling evidence that nuts have a strong and independent protective effect against CHD. They observe that consuming nuts more than once a week significantly decreased the relative risk for CHD in both men and women. The authors conclude that data from epidemiologic and controlled clinical trials support a recommendation to include nuts in a healthy diet that meets energy needs in order to reduce risk for CHD.

These publications further demonstrate that there is significant scientific agreement that the totality of publicly available scientific evidence fully supports the proposed claim, "Diets Including Walnuts Can Reduce the Risk of Heart Disease."

Respectfully submitted,

  
Miriam J. Guggenheim

Enclosures

cc: Dennis A. Balint, California Walnut Commission