

# **INSTITUTE OF SHORTENING AND EDIBLE OILS, INC.**

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February 17, 2004

Division of Dockets Management  
Food and Drug Administration  
5630 Fishers Lane, Room 1061 (HFA-305)  
Rockville, MD 20852

Re: Comment on Docket 2003Q-0559  
(Qualified Health Claim: Monounsaturated fatty acids and  
reduced risk of coronary heart disease.)

Dear Dockets Management Office:

The Institute of Shortening and Edible Oils (ISEO) supports the establishment of a qualified health claim that applies to the ability of all vegetable oils relatively high in polyunsaturated and/or monounsaturated fatty acids to reduce the risk of coronary heart disease (CHD). ISEO believes the scientific evidence presented by the North American Olive Oil Association in its above referenced petition of August 28, 2003, adequately demonstrates the relationship between the substitution of polyunsaturated and/or monounsaturated fatty acids for saturated fatty acids and a decrease in CHD risk. However, we believe the scope of the qualified health claim should be expanded to include other vegetable oils.

ISEO supports the comments presented to FDA by ACH Food Companies, Inc. on February 16, 2004, regarding the above-referenced docket. We believe the establishment of a qualified health claim that will help communicate the health benefits of vegetable oils containing relatively high levels of unsaturated fatty acids is highly appropriate and fully justified by scientific evidence.

ISEO is a trade association representing the interests of edible oil and fat refiners in the U.S. Its eighteen member companies process approximately 90-95% of the edible fats and oils produced annually (20 billion pounds) which are used as baking or frying fats (shortening), salad and cooking oils, margarines and spreads, and confectionary fats and as ingredients in a wide variety of food products.

Thank you for your consideration of these comments.

Sincerely,

Robert M. Reeves, President