



SEP 27 2002

Food and Drug Administration
College Park, MD 20740

Dennis A. Balint
Chief Executive Officer
California Walnut Commission
1540 River Park Drive
Suite 203
Sacramento, California 95815-4609

Dear Dr. Balint:

This letter is in response to your letter dated September 11, 2002, to Michael A. Adams, in which you support the health claim petition submitted by the California Walnut Commission.

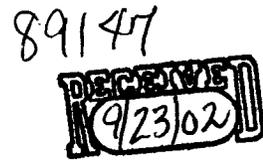
We appreciate your interest in the issues raised in the health claim petition. We have forwarded your letter to the Dockets Management Branch (HFA-305) for inclusion in the administrative record under Docket No. 02P-0292. Your letter will be considered by the agency in its deliberations on what action to take on the California Walnut Commission's health claim petition.

Sincerely,

James E. Hoadley, Ph.D.
Team Leader for Nutrition Labeling and Programs
Division of Nutrition Science and Policy
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition

02P-0292

CIS/ANS



September 11, 2002

Michael A. Adams, Ph.D.
Acting Director, Division of Nutrition Science and Policy
Office of Nutritional Products, Labeling, & Dietary Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
Harvey W. Wiley Building
5100 Paint Branch Parkway
College Park, Maryland 20740-3835

Attention: Docket # 02P-0292

I am writing in regard to the Health Claim Petition submitted by our industry requesting that FDA approve a statement for walnuts indicating that ". . . a diet including walnuts can reduce the risk of coronary heart disease (CHD). . .", per the docket number noted above.

The science supporting this petition is sound. The epidemiological data (the Seventh - day Adventist Study, the Iowa Women's Study, the Nurse's Health Study and the Physician's Health Study) and the clinical trails are both positive and consistent.

In particular, the Barcelona Walnut Trial (published in the *Annals of Internal Medicine* in April 2000) points to the unique properties of the walnut versus other naturally occurring whole foods. In that clinical trial, *walnuts replaced foods that were low in saturated fat and high in monounsaturated fat* and reduced LDL cholesterol by 5.9%. Thus, the walnut, which is rich in polyunsaturated fatty acids such as n-3 (omega-3), exhibited its point of difference from foods rich in monounsaturated fats.

One ounce of walnuts provides 2.5 grams of alpha-linolenic acid. In the world of nuts, pecans provide .5 grams while other nuts contain no n-3 (source: USDA data base). This is of significant importance in light of the National Academies' Institute of Medicine report released less than one week ago recommending a daily intake of n-3 at a level of 1.1 grams for women and 1.6 grams for men. Among nuts, only walnuts fulfill this requirement.

California Walnut Commission

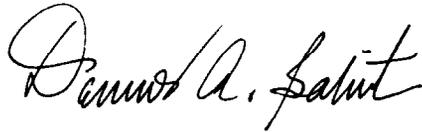
Walnuts are a good source of vitamin E, dietary fiber, folic acid, vitamin B-6, magnesium, copper, zinc and potassium all of which have been shown to reduce CHD. In all of the studies there has been no evidence which would associate the consumption of walnuts with weight gain. In fact, a modest weight loss was indicated in several studies (although not significant).

It is important for consumers to have knowledge regarding good dietary choices. We believe that the evidence in support of this petition demonstrates that walnuts will benefit consumers in the establishment of healthful eating patterns and decrease CHD in America and certainly, this is in the interest of the public health.

We appreciate your consideration of this information.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Dennis A. Balint". The signature is written in black ink and is positioned above the printed name and title.

Dennis A. Balint
Chief Executive Officer