



SEP 25 2002

Food and Drug Administration
College Park, MD 20740

Anderson M. Morris, M.D.
Medical Director, Healthsouth Heart College
Director of Cardiology
Chairman, Department of Medicine
Healthsouth Medical Center
1201 11th Avenue South
Birmingham, Alabama 35203

Dear Dr. Morris:

This letter is in response to your letter dated September 10, 2002, to Michael A. Adams, in which you support the health claim petition submitted by the California Walnut Commission.

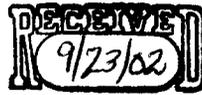
We appreciate your interest in the issues raised in the health claim petition. We have forwarded your letter to the Dockets Management Branch (HFA-305) for inclusion in the administrative record under Docket No. 02P-0292. Your letter will be considered by the agency in its deliberations on what action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

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September 10, 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 Federal Building
5100 Paint Branch Parkway
College Park, MD
20740-3835

Dear Dr. Adams,

Over half of Americans alive today are destined to die a vascular death. The tragedy is that the vast majority of vascular deaths are preventable, as they are caused by our diet and exercise habits. The epidemic of obesity in our young people will be followed by a more serious epidemic of diabetes and then an even more devastating epidemic of heart attack and sudden death. The medical system in the United States is ill equipped to handle this increase in cardiac events so it is mandatory that we develop a more robust system of prevention.

As a preventive cardiologist I feel strongly that omega 3 fatty acids play a critical role in protection from vascular events. For this reason I support the Health Claim Petition stating that diets including walnuts can reduce the risk of heart disease (Docket 02P-0292).

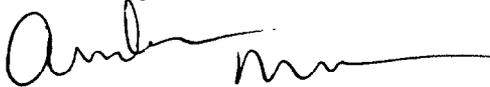
There are strong evidence-based data indicating that walnuts reduce cholesterol. It is well documented that cholesterol lowering from any cause is associated with a decrease in cardiac events. Also, in the Physicians' Health Study, analysis of mixed nut intake showed a huge reduction in sudden death with just two one-ounce servings per week. Similar results have been seen with fish oil intake, and the omega 3 fatty acids found in both fish and nuts (especially walnuts) are thought to stabilize the heart rhythm and help prevent the electrical abnormalities that kill most victims within the first hours of their heart attack.

Walnuts specifically stand out from other tree nuts and legumes as having a high concentration of omega 3 fatty acids. They are also high in fiber and other nutrients, so their interplay with the human body is complex. However, they have been shown to be safe when ingested in normal amounts so there is little concern of toxicity.

I have found that recommending walnuts to my patients is a very clear health signal to them. While I also discuss fish, fruits and vegetables, these are more vague categories that require explanation, such as what types of fish are best, and how to prepare them. Once introduced, walnuts speak for themselves.

While vascular disease is now an epidemic in the United States, the public is rapidly becoming more aware of the need to change dietary habits. Our culture, however, is still pushing us into poor food choices, and the average citizen has difficulty finding the right answers, though the scientific evidence is there. We need clear guideposts as to what foods to choose and what to avoid. Your approval of labeling that walnuts can reduce the risk of coronary heart disease would be a benefit to the public and to healthcare.

Sincerely,



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