

INSTITUTE OF SHORTENING AND EDIBLE OILS, INC.

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December 17, 1999

Jane E. Henney, Commissioner, FDA  
Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Re: Request for extension of  
comment period for Trans Fatty  
Acids in Nutrition Labeling,  
Nutrient Content Claims and  
Health Claims; Proposed Rule;  
Docket No. 94P-0036

Dear Commissioner Henney:

The Institute of Shortening and Edible Oils (ISEO) has reviewed FDA's proposed rule for "Food Labeling: Trans Fatty Acids in Nutrition Labeling, Nutrient Content Claims, and Health Claims." We believe the time period currently provided for comments is inadequate to allow for sufficient preparation of comments by interested parties including the ISEO. We therefore respectfully request the comment period for this proposed rulemaking be extended by at least 60 days beyond the current February 15, 2000 deadline.

The ISEO is a trade association representing the refiners of edible fats and oils in the U.S. Our 22 members process approximately 90-95% of the edible fats and oils processed in the U.S. annually (18 billion pounds). These fats and oils are used in baking and frying fats (shortening), salad and cooking oils, margarines and spreads, confectionery fats and as ingredients in a wide variety of food products. ISEO as a major supplier of fats and oils to the food industry has a major interest in this proposed rule.

This proposal to include trans fat in nutrition labeling and establish limitations on trans fat in foods for which nutrient content claims and/or health claims may be made requires substantial analysis of nutrient databases and food product formulation to predict the effects upon food products. Significant time is necessary to review the scientific evidence

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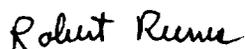
included in and omitted from the document. A comprehensive evaluation of the various options offered by FDA is a significant undertaking in itself. While FDA has apparently spent much time in making its economic analysis of the impact of this proposal, it will also take significant time for industry to establish economic models and properly evaluate them.

The current comment period also includes three major holidays (Thanksgiving, Christmas, New Year's) in which many individuals will have limited time or simply not be available to work on this important issue. The comment period also runs through the critical Y2K period in which many companies will be taking precautionary measures to prevent computer-related problems. Special computer analyses of data may not be available while corrective modifications or computer tests are being performed.

This proposal by FDA is quite a comprehensive change in food labeling which should be carefully and thoroughly considered regarding its appropriateness, structure and economic impact. This proposal if made final in its present form will have significant impact on consumers ability to comprehend the food label and take away meaningful interpretations. It is therefore crucial that adequate time be allowed to appropriately address the many issues involved in this proposed rulemaking. We therefore request FDA to extend the comment period by at least 60 days.

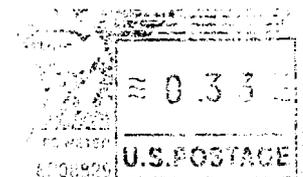
Thank you for your serious consideration of this request.

Sincerely,



Robert M. Reeves  
President

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