



PENNSYLVANIA CITIZENS
CONSUMER COUNCIL

P.O. BOX 736
EDINBORO, PA 16412-0736

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January 3, 2000

In re Docket # 94P-0036
Trans Fatty Acids in
Nutrition Labeling

Dockets Management Branch, HFA-301
Food & Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

To the U.S. Food & Drug Admn:

The PA Citizens Consumer Council strongly supports the proposal by the FDA to amend its regulations on nutrition labeling to require that the amount of trans fatty acids in a food be included in the Nutrition Facts panel. For that matter, PCCC believes that such action is long overdue, going as far back as 1979 when the University of Maryland first warned that hydrogenated oils increased the risk, above and beyond any other fat that occurs in nature, for cancer, let alone heart attacks. Since that time, during the intervening years, numerous studies have been conducted which have shown the dangers of hydrogenated oils which now show up in an ever-increasing number of commodities on supermarket shelves. With these studies having been available over the years, the question is why it has taken the FDA so long to recognize the dangers associated with these oils.

The onset of these oils can be traced in their severity to the 1920s when the incidence of heart attacks (myocardial infarction) leaped upward to the point that today hundreds of thousands of people die annually in the U.S. alone from this degenerative condition. Prior to the 1920s people utilized butter and lard as the chief ingredients for cooking and for spreading on bread and other pastries. But, during the late 1920s and early 1930s, the concept of the removal of oils from vegetable seeds -- soybeans, sunflowers, cotton seeds, corn and other seeds -- was introduced as a substitute for the previous ingredients of butter and lard. Why? Mainly, because they were cheaper. As researcher, chemist and metallurgist Wayne Martin pointed out in his work, **We Can Do Without Heart Attacks**, the oils from these seeds, in themselves, are perfectly harmless, edible and safe, if ground, heated and pressed in the accepted manner. But, this is not the process used by industry in breaking down and removing these oils from the seeds. As author Bill Petterson has pointed out in ACRES U.S.A., "Giant corporations, with vast profits as their single motivating force, decided early on that the **removal of the remaining oils by any possible recovery technique available** [our emphasis] was justified by the resultant increase in income."

It had been discovered by scientists that solvents could be united with other elements in a compound, and thus permitted their separation from the original combination -- solvents which range from mild to deadly poisons. (This extraction method

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Comments of PA Citizens Consumer Council

can be found in **Bailey's Industrial Oil and Fat Products**). In the process, various solvents are mixed with the ground or crushed seeds, uniting them with the oils and effecting a separation from the mash. After the solvent-oil mixture has been pressed, washed and strained from the mash, additional heat is applied which vaporizes most of the solvent out of the oil, which then remains a dark, gooey, horrible smelling mess, in the words of author Petterson.

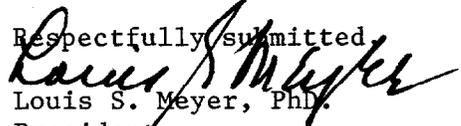
The continuation of the process includes the addition of chemical bleach to the oil to remove the burned effect resulting from the high heat (as high as 450°), chemical deodorizers to remove the foul odors, and finally, chemical esters or fragrances to create a pleasant smell to cover or hide the rancidity that quickly develops in the opened and unrefrigerated product. Very importantly, these oils still contain levels of solvents, bleaches, deodorizers and esters that are very dangerous when ingested over a period of time with the capability of causing cancer. And with the radical alteration of the molecular structure of the oils in the processing, "...up to 17% of the natural cis-cis linolenic acid is converted to unnatural isomers, the most damaging of which is trans-trans (altered) linolenic acid with high percentages of these isomers contained in bread, baked goods, chips and many other commodities." It is these isomers that are highly responsible for small blood clots that can cause heart attacks. And, as these hydrogenated oils have increased in usage over the past 75 years, the incidence of myocardial infarction has risen in almost direct proportion, according to the outstanding research of Wayne Martin.

But, the problem goes even further. According to internationally renowned clinical nutritionist, Dr. Robert J. Marshall, hydrogenated oils weaken the cell membranes and make them more vulnerable to attack of any kind, but particularly from excitotoxins such as aspartame, monosodium glutamate and other excitotoxins. As a combination, the excitotoxins and hydrogenated oils can be deadly -- and are.

While we understand that the FDA has approved aspartame and other questionable ingredients used in the food chain it does not mean that we have accepted the FDA's appraisal of the safety of these ingredients. We have analyzed the work of recognized authorities such as Dr. Keith Connors, Dr. Richard Wurtman and Dr. Judith Wurtman, among others, on the subject of excitotoxins such as aspartame and along with the work of Martin, Bailey and others can only conclude that the utilization of hydrogenated oils, coupled with excitotoxins to such a massive extent in our food supply, is a deadly chronic disease time-bomb waiting to explode. And, as if to contradict our own statement, we also feel that the time-bomb may well have already gone off in view of the fact that the vast majority of testing done by government agencies is done on single ingredients, not on multiple ingredients used in the same commodity. Lacking this kind of testing, we have no -- or possibly very little -- knowledge of how these ingredients used in concert with each other in the same commodity are contributors to the cancer, heart and other chronic disease epidemics which have confronted our nation for the past quarter century.

Indeed, we urge the proposed amendment but urge the FDA to go even further and engage in the necessary testing to get at the heart of our chronic disease epidemics.

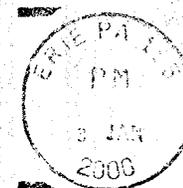
Respectfully submitted,


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President

PCCC

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