

Elliott Frauenglass, Ph.D.

303 Lamplighter Lane, Newington, CT 06111

Phone (860) 666-8495 Fax (860) 665-0533

3561 00 JAN -7 10 53

January 3, 2000

Dockets Management Branch (HFA-305)
FDA
5630 Fishers Lane, Rm 1061
Rockville, MD 20852

Dear Sirs: RE: Docket # 94P-0036: Labeling Trans-Fat Content of Foods

This is not hard to understand.

Natural unsaturated fats are all in the cis position, which means that both arms of the molecules are pointing in the same direction, like the top and bottom of the capital letter "E". When these fats are partially hydrogenated, the catalytic process that is used, causes the arms of all the remaining molecules that are not hydrogenated, to point in opposite directions like the letter "Z", which is called the trans position.

1. These trans fats are not natural, and for that reason they are literally synthetic chemical additives.
2. Huge epidemiological studies have tied the consumption of margarine (which is currently all made with the trans fats) to greatly increased arteriosclerosis and deaths from heart attacks.
3. Biochemical research has shown that these trans fats are very difficult for the body to get rid of.

For the above reasons, whose facts you know better than I do, it would be prudent to ban, or gradually phase out the trans fats, starting by requiring them to be listed on the food contents as Trans Fats.

What isn't well known, is that there would be little if any economic impact or hardship. The reason is that fats that are, say, 10% partially hydrogenated, have the same physical characteristics as fats that are not hydrogenated (all in the natural cis form) when combined with 10% of fat that is 100% hydrogenated. (100% hydrogenated fats are identical with natural fats, and do not have orientation problems.)

For the above reason, the producers of vegetable oils will have the same sales volumes. Even the people doing the hydrogenation will still be in business.

Right now, almost all of America's favorite snacks are made with trans fats. But I just found a jar of Jiff Reduced Fat Peanut Butter, Creamy Style; and it is made as above. It has a small amount of 100% hydrogenated vegetable oil (no partially hydrogenated, i.e. trans stuff) and it tastes the same as regular peanut butter. Maybe manufacturers are getting ready to change for the better, if you give them the needed push.

Good luck with the proposed legislation.

Sincerely yours,



Elliott Frauenglass, Ph.D.
Organic Chemist

94P-0036

C1075

Elliott Frauenglass, Ph.D.
303 Lamplighter Lane
Newington, CT. 06111



Dockets Management Branch (HFA-305)
FDA
5630 Fishers Lane, Rm 1061
Rockville, MD 20852

2085740001

