

**NCPA**  
**NATIONAL COTTONSEED**  
**PRODUCTS ASSOCIATION**

P. O. BOX 172267  
MEMPHIS, TN 38187-2267  
TELEPHONE (901) 682-0800  
FAX (901) 682-2856

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Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, rm. 1061  
Rockville, MD 20852  
Docket No. 94P-0036

**Re: Food Labeling: Trans Fatty Acids in Nutrition Labeling, Nutrient Content Claims, and Health Claims; Reopening of the Comment Period (65 FR 75887; Dec. 5, 2000) (Docket No. 94P-0036)**

Dear Sir or Madam:

The National Cottonseed Products Association (NCPA) and the National Cotton Council (NCC) submit these comments in response to FDA's request for comments (65 FR 75887; 12/5/00) on whether FDA should define the nutrient content claims "reduced trans fat" and "reduced saturated and trans fats". NCPA and NCC feel strongly that nutrient claims should be able to be made for both "reduced trans fat" and "reduced saturated fat" but that the two should not be combined. FDA should define "reduced trans fat" and "reduced saturated fat". In addition the amount of saturated and/or trans fat that should be required to allow reduced content nutrient labeling should be a 20 % reduction in saturated fat and/or trans fat.

NCC is the central trade association of the U.S. cotton industry, representing producers, ginners, oilseed crushers, merchants, cooperatives, warehouses, and textile manufacturers in 18 states. On average, NCC members produce and gin over 17 million bales of cotton and NCC cottonseed members handled over 6.5 million tons of cottonseed for oilseed processing and dairy feeding.

NCPA is a trade association representing the cottonseed crushing industry. NCPA crusher members process cottonseed to produce cottonseed oil as well as other products. Cottonseed oil is used in snack foods, as a bakery shortening, in salad dressings, as a foodservice oil, and occasionally as a retail-shelf oil. NCPA member firms handled between three and four million tons of seed in 2000 at 30 plants employing an estimated 1800 workers and generating an estimated \$1 billion in revenue.

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**Claims should be allowed for both “reduced saturated fat” and/or “reduced trans fat”**

Research is currently inconclusive as to the effect of trans fatty acids (TFA) and Saturated Fat on a gram-for-gram basis, and the Agency recognized (64 FR 62753; Nov. 17, 1999) that there is no definitive answer as to “whether trans fatty acids have an effect on LDL-C (low-density lipoprotein-cholesterol) and CHD (coronary heart disease) risk equivalent to saturated fats on a gram-for-gram basis.” Since TFA are not the same chemical compounds as saturated fats and there is scientific evidence that TFA perform different physiologically, we believe that a product with either or both reduced TFA or saturated fat should be able to make a separate claim about this.

**FDA should not use the combined term “reduced saturated and trans fat”**

Since it is probable that future research will confirm the different roles of trans fat and saturated fat, separate statements should be used for reduced “TFA” and “saturated fat”. Allowing fats and oils to state “reduced trans fat,” or “reduced saturated fat” separately would give consumers some key guidelines for purchasing heart-healthy oils. As was stated in earlier comments by NCPA and NCC (Feb. 14, 2000 and Apr. 15, 2000, respectively), we strongly supports the separation of saturated and trans fats on the nutrition panel and in any comparative statements made on either products containing fats as ingredients or on packaged fats and oils. This approach is more informative to the consumer who seeks heart healthy products.

**The amount of reduction of saturated and/or trans fat required for comparative labeling should be 20 %**

NCPA and NCC suggest that statements regarding the level of TFA in fats and oils be solely dependent upon the level of TFA and that statements regarding saturated fat content should be based solely on the level of saturated fat. Combining the two is inherently confusing and of doubtful scientific accuracy. We believe that fats and oils that contain < 0.5g TFA should be able to make the statement “trans fat free” and that non-hydrogenated fats and oils should be allowed to state “non-hydrogenated” or “no hydrogenation” or “not hydrogenated,” as well as stating “reduced trans fat” and/or “reduced saturated fat.” This would allow for the nutrition community to continue advising consumers to eat products lower in saturated fat and in addition, look for fats and oils that are reduced in TFA, or are trans fat free or non-hydrogenated, thus effectively limiting consumer TFA intake. Advising consumers to continue to use saturated fat as a principle criteria for selecting a heart-healthy oil and recommending non-hydrogenated oils would likely have the greatest impact on consumers selecting a heart-healthy oil.

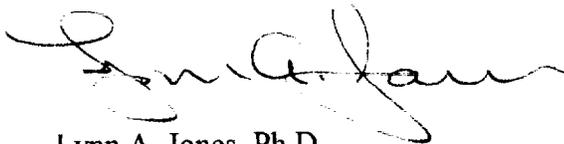
We believe that the reduction in either TFA or saturated fat that should be required to allow for a reduced TFA and/or saturated fat claims should be liberal. The public health community has long fought for every percentage point reduction in saturated fat consumption and boldly noted each small change. We believe that small reductions (20%) in saturated and/or trans fat are meaningful to the consumer and should be the criterion needed to allow the claim(s).

**Summary**

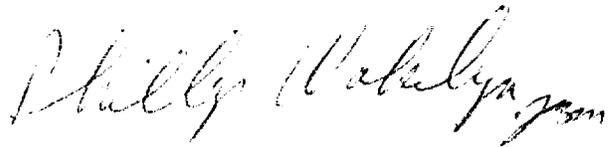
In summary, NCPA and NCC urge that FDA:

- (1) allow and define claims for both "reduced saturated fat" and/or "reduced trans fat";
- (2) the terms should be "reduced saturated fat" and/or "reduced trans fat", not the combination of both, "reduced saturated and trans fat"; and
- (3) the amount of saturated and/or trans fat that should be required to allow reduced nutrient labeling of an oil or fat as "reduced saturated fat" and "reduced trans fat" should be 20%.

Sincerely,



Lynn A. Jones, Ph.D.  
Executive Vice President  
National Cottonseed Products Association  
P.O. Box 172267  
Memphis, TN 38187-2267  
Voice: 901.682.0800 FAX: 901.682.2856  
e-mail: lajones@cottonseed.com



Phillip J. Wakelyn, Ph.D.  
Senior Scientist, Environmental Health & Safety  
National Cotton Council of America  
1521 New Hampshire Ave. N.W.  
Washington, D.C. 20036  
Voice: 202.745.7805 FAX: 202.483.4040  
e-mail: pwakelyn@cotton.org