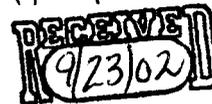




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September 11, 2002

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 Building  
 5100 Paint Branch Parkway  
 College Park, Maryland 20740-3835

Attention: Docket # 02P-0292

I am writing in regard to the Health Claim Petition submitted by our industry requesting that FDA approve a statement for walnuts indicating that "... a diet including walnuts can reduce the risk of coronary heart disease (CHD). . .", per the docket number noted above.

The science supporting this petition is sound. The epidemiological data (the Seventh - day Adventist Study, the Iowa Women's Study, the Nurse's Health Study and the Physician's Health Study) and the clinical trails are both positive and consistent.

In particular, the Barcelona Walnut Trial (published in the *Annals of Internal Medicine* in April 2000) points to the unique properties of the walnut versus other naturally occurring whole foods. In that clinical trial, *walnuts replaced foods that were low in saturated fat and high in monounsaturated fat* and reduced LDL cholesterol by 5.9%. Thus, the walnut, which is rich in polyunsaturated fatty acids such as n-3 (omega-3), exhibited its point of difference from foods rich in monounsaturated fats.

One ounce of walnuts provides 2.5 grams of alpha-linolenic acid. In the world of nuts, pecans provide .5 grams while other nuts contain no n-3 (source: USDA data base). This is of significant importance in light of the National Academies' Institute of Medicine report released less than one week ago recommending a daily intake of n-3 at a level of 1.1 grams for women and 1.6 grams for men. Among nuts, only walnuts fulfill this requirement.

02P 0292

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California Walnut Commission

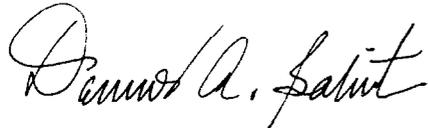
Walnuts are a good source of vitamin E, dietary fiber, folic acid, vitamin B-6, magnesium, copper, zinc and potassium all of which have been shown to reduce CHD. In all of the studies there has been no evidence which would associate the consumption of walnuts with weight gain. In fact, a modest weight loss was indicated in several studies (although not significant).

It is important for consumers to have knowledge regarding good dietary choices. We believe that the evidence in support of this petition demonstrates that walnuts will benefit consumers in the establishment of healthful eating patterns and decrease CHD in America and certainly, this is in the interest of the public health.

We appreciate your consideration of this information.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Dennis A. Balint". The signature is written in black ink and is positioned above the printed name and title.

Dennis A. Balint  
Chief Executive Officer