



LLC
PROCESSORS OF FINE SHORTENINGS & OILS

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October 8, 2003

Docket Management Office
(HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: Food Labeling: *Trans* Fatty Acids in Nutrition Labeling: Docket No. 03N-0076

Gentlemen:

Golden Foods, LLC and Golden Brands, LLC (GF/GB) are affiliated companies that process vegetable oils to produce edible oils and shortenings. A majority of our products are used in the baking industry. We are members of The Institute of Shortening and Edible Oils (ISEO) and to a large extent we are in agreement as to the basics, background, and comments that the ISEO is offering to FDA on this topic. However, as is always the case when a collection of interests attempt to put forth a position that appeases everyone, there are exceptions. Often compromises are made because of differing views. On that basis we feel compelled to briefly offer some of our own views on this topic, especially where our views contrast with those put forth by the ISEO.

GF/GB has identified a couple of basic principles that we feel are paramount in considering the issue at hand:

1. **All parties should be focused and guided by good science.** This should apply in all facets, whether it be development of a percent daily value (DV), definition of a nutrient content claim (e.g. reduced *trans* fat, etc), or modification of existing nutrient content claims. The scientific data available today is incomplete. A DV should not be established without adequate science. However, neither should a "free, reduced or low" *trans*, saturates or cholesterol nutrient content claim that merely allows for substitution of a percentage of one type of fat for the other, especially when that percentage is not based on sound science. All should be cautious of leaving holes in definition of nutrient content claims that may be used for purposes of marketing to consumers. Those holes need to be plugged by definitions based on solid science.

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- 2. The Nutrition Facts label should be “quantitative” (data) and not “qualitative” (interpretation of data).** There are a number of ways to educate consumers about dietary issues and qualitative conclusions may change based on new scientific data. These education tools can be changed easily as this occurs. The Nutrition Facts label will maintain its integrity and flexibility in the face of accumulating scientific information by staying quantitative. Any footnotes added to the Nutrition Facts label should also be restricted to be quantitative in nature.

We appreciate the opportunity to put forth our views on these proposed rules and are available to assist FDA in any way we reasonably can.

Sincerely,

A handwritten signature in black ink that reads "Timothy D. Helson". The signature is written in a cursive, flowing style.

Timothy D. Helson

Cc: President George W. Bush
Senator Mitch McConnell
Senator Jim Bunning
Congresswoman Anne Northup