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April 30, 2004

Robert E. Brackett, (HFS-001), Director  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
Room 4B064, Harvey W. Wiley Federal Building  
5100 Paint Branch Parkway  
College Park, MD 20740-3835

Re: Nutrient Content and Health Claims for Omega-3 Fatty Acids

Dear Dr. Brackett:

As an organization concerned about the health of Americans, Shape Up America! -- a non-profit organization whose mission is to encourage a better diet in all individuals and a healthy weight loss in individuals that can be maintained over time -- is writing this letter in support of a notification recently filed with the Center for Food Safety and Applied Nutrition to permit nutrient content claims for omega-3 fatty acids.

At a time when this country is facing an unprecedented epidemic of obesity in children and adults, this action alone could be an important step in reducing the risk for cardiovascular disease, one of the leading co-morbid conditions for obesity. According to the September 2002 report of the Institute of Medicine (IOM), "Dietary Reference Intakes for Energy, Carbohydrate, Fiber, Fat, Fatty Acid, Cholesterol, Protein and Amino Acid," a growing body of evidence demonstrates that two of the essential omega-3 fatty acids -- DHA (docosahexaenoic acid) and EPA (eicosapentaenoic acid) -- can reduce the risk of coronary heart disease by lowering blood pressure, reducing the levels of triglyceride fat and plaque formation, and by improving the overall health of the arterial system.

Because the science on DHA and EPA is so promising, there is widespread support within the public health community for promoting the benefits of omega-3 fatty acids to Americans. For example:

- The American Heart Association recommends that Americans eat foods rich on omega-3 fatty acids at least twice a week to reap the specific health benefits;

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- On the basis of current research, FDA has approved a qualified health claim for dietary supplements of omega-3 fatty acids relating them to a reduced risk for heart disease;
- In May 2003, the Office of Management and Budget sent a "prompt letter" to the Departments of Health and Human Services and Agriculture urging that revisions to the Dietary Guidelines and Food Guide Pyramid include specific information about omega-3 fatty acids; and
- The Consumer Health Information for Better Nutrition Initiative Task Force issued a report recommending that a health claim about consuming foods high in omega-3 fatty acids should be a priority for the FDA.

While these actions have important value within the nutrition and public health community, they cannot take the place of the kind of very specific information that consumers need now to increase their consumption of omega-3 fatty acids. That is why Shape Up America!, as a leading nutrition organization, is urging FDA to permit nutrient content claims for omega-3 fatty acids based upon the "authoritative statement" contained in the Institute of Medicine report, which establishes a daily recommended intake value for DHA and EPA.

Thank you in advance for your consideration.

Sincerely,



Barbara J. Moore, Ph.D.  
President and CEO  
Shape Up America!

cc:

Dr. Lester M. Crawford (HF-1)  
Deputy Commissioner  
Food and Drug Administration  
5600 Fishers Lane  
Room 1471  
Rockville, MD 20857