



Thomas
Jefferson
University

Jefferson
Medical
College

Anesthesiology Program for
Translational Research

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Thursday, April 12, 2007

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US FDA
Rockville, MD

Dear FDA:

Re: Docket # 2007P-0085

I solicit your support *against* the proposed and pending changes to chocolate (Docket # 2007P-0085 Adopt Regulations of General Applicability to all Food Standards that would Permit Deviations from the Requirements of the Individual Food Standards of Identity), submitted by the Grocery Manufacturers Association/Food Products Association (GMA/FPA) on behalf of a number of organizations including the Chocolate Manufacturers Association (CMA). I understand that as part of this petition, the CMA has petitioned the U.S. Food and Drug Administration (FDA) to approve a change in the Standard of Identity for chocolate products to allow for the use vegetable fats in chocolate and milk substitutes and to be permitted to call the product chocolate.

I am opposed to these changes and say to GMA/FPA and particularly to the CMA, leave chocolate alone!

Don't Mess with Our Chocolate.

I love it just the way it is; made with 100% cocoa butter and real milk, rather than some concocted blend of fats and other substitutes. The following lists the primary reasons why I oppose their petition and why this is not in the best interest of the consumer:

- 1). Without proper labeling, consumers will find it difficult and confusing to differentiate the current gold standard of real chocolate vs. this new concoction, which has substitute ingredients. This will amount to economic fraud to the consumer as the product will become cheaper with inferior ingredients.
- 2). None of what is being proposed benefits the consumer, nor was any consumer research submitted to support such changes.
- 3). Their proposed formula will contain large quantities of bad Trans fats, which are not good for your health.
- 4). They are meddling with everything that we love about chocolate.
- 5). Cocoa butter is unique; vegetable fats can only masquerade as cocoa butter.
- 6). the eating properties, flavor and mouth feel will all be different.
- 7). All manufacturers, even those who do not want to support this, will be forced to convert to the new concoction due to the economic advantages associated with the new formula and their wanting to remain effectively competitive within the category. The net effect will be a total downgrade in the eating enjoyment and quality for chocolate.

For these reasons above, I strongly urge you to not allow the gold Standard of Identity of chocolate to be changed. Thank you for your support in sending the message to the CMA/GMA/FPA:

Sincerely,

Valeric E. Armstead, M.D.

Associate Professor of Anesthesiology

2007P-0085

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