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May 14, 2003

Mark B. McClellan, M.D., Ph D.  
Commissioner  
Food and Drug Administration  
Parklawn Building  
5600 Fishers Lane  
Rockville, MD 20857

Dear Dr. McClellan:

The U. S. Canola Association (USCA) is writing in support of the Food and Drug Administration's proposal to require information on trans fats on the nutrition labels of food products.

Researchers have demonstrated that a higher dietary intake of saturated and trans fats are associated with an increased risk of coronary heart disease whereas a higher intake of monounsaturated and polyunsaturated fats is associated with a decreased risk. Canola oil has the lowest saturated fats content of any vegetable oil and is rich in beneficial monounsaturated (oleic) acid, which makes the nutritional profile of canola oil one of the healthiest choices for consumers seeking a diet low in dangerous fats. Canola oil is also naturally stable and thus a viable healthy alternative to other vegetable oils that must be partially hydrogenated for stability.

We strongly support FDA's proposal to express the amount of trans fats in a food product in terms of grams per serving of a stated size. This approach parallels the current method for identifying the amount of saturated fats, and is a valuable and objective guide for consumers in comparing the nutritional values of different products.

With regard to the trans fats footnote proposed by FDA, we are concerned that the statement, "Intake of trans fats should be as low as possible," could become the primary or even exclusive factor in food choices by consumers. It is possible for certain food products that contain low trans fats levels to also contain elevated levels of saturated fatty acids. Since both trans fats and saturated fats have been determined to be detrimental to human health, referencing their combined content would present a more accurate picture of a food product's nutritional profile.

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Health Canada recognized the need for a diet low in both trans fats and saturated fats when developing Canada's new nutrition label. The label, implemented earlier this year, requires the consideration of the combined content of trans fats and saturated fats when allowing a food product to make nutrient content claims and certain diet-related health claims. USCA supports this concept.

As an alternative to harmonizing the new U. S. label with Canada's existing label with regard to trans fat labeling, USCA recommends that saturated fats also receive an asterisk and be included in the footnote statement. The referenced footnote could be amended to read, "Intake of trans fats and saturated fats should be as low as possible."

USCA looks forward to working with FDA on this important issue.

Sincerely,

A handwritten signature in black ink that reads "Paul Tyler". The signature is written in a cursive, flowing style.

Paul Tyler  
President, USCA