

April 4, 1995

Commissioner David Kessler
5600 Fishers Lane
Room 1471
Rockville, MD 20857

Dear Commissioner Kessler:

A growing body of evidence suggests that *trans* fatty acids raise blood cholesterol levels and increase the risk of coronary heart disease. We therefore urge the Food and Drug Administration (FDA) to require food labels to give complete information on the sources of those fatty acids in food.

We compliment FDA for taking some actions to protect consumers from the adverse health effects of *trans* fatty acids. For example, new food labels do not allow *trans* fatty acids to be included in voluntary listings of unsaturated fatty acids and limit the amount of *trans* fat in products with saturated-fat-free claims. Although those steps are a good beginning, further action is needed.

I. Require labels to include *trans* fatty acids with saturated fatty acids.

We urge FDA to amend food-labeling regulations to require that *trans* fatty acids be included in the definition of saturated fatty acids for nutrition labeling purposes. Such a change will aid consumers who want to limit their consumption of all heart-unhealthy fats.

Although *trans* fatty acids are not saturated by a chemical definition, they share in common the important physiologic effect of increasing the risk of coronary heart disease. That common effect is critically important to consumers and more relevant than strict chemical definitions.

II. Limit the *trans* fatty acid content of foods making fatty acid, cholesterol, or vegetable oil claims.

We also urge FDA to limit claims made for foods that contain significant levels of *trans* fatty acids. Nutrient content claims like "low in saturated fat," "reduced saturated fat," "cholesterol-free," and "low cholesterol" should be prohibited unless the total

saturated plus *trans* fatty acids meets FDA's saturated-fat limits for such claims. Hidden sources of cholesterol-raising fatty acids, such as unlabeled *trans* fatty acids, mislead consumers, who expect foods with those claims to be low in all heart-unhealthy fats. FDA should allow health claims related to heart disease only on foods that are low in saturated and *trans* fat combined.

FDA should also prohibit claims like "made with vegetable oil" unless the final product is low in saturated and *trans* fatty acids combined. "Made with vegetable oil" implies that the oil is low in not only saturated fat, but all heart-unhealthy fats.

III. Require ingredient labeling to identify "partially hydrogenated oil" as "partially saturated shortening."

FDA should change the term "partially hydrogenated oil" in ingredient statements to "partially saturated shortening" to better reflect the nature of those fats in terms that are meaningful to consumers. As you know, the process of hydrogenation adds hydrogen to carbon-carbon double bonds, reducing the number of double bonds and increasing the number of saturated carbon atoms. Thus, the term "partially saturated" accurately describes the hydrogenated fat. Since consumers are familiar with the term "saturated" and associate it with fats that can raise blood cholesterol levels, describing these fats as "partially saturated" would be more meaningful.

Given the growing evidence that *trans* fatty acids increase blood cholesterol levels and the risk of coronary heart disease, we urge FDA to require food labels to disclose *trans* fatty acid content and stop misleading labeling claims. Such changes will allow people to identify and avoid those cholesterol-raising fatty acids, and ultimately, improve the public's health.

Sincerely,



cc: Dockets Management Branch (HFA-305)
Food and Drug Administration
Room 1-23
12420 Parklawn Drive
Rockville, MD 20857
Re: Docket No. 94P-0036/CP1