

May 17, 2004

Acting Commissioner Lester Crawford, D.V.M.
U.S. Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

Dear Commissioner Crawford:

We, the undersigned researchers and scientists, call on the Food and Drug Administration to prevent the harm caused by the trans fat that Americans are consuming due to the food industry's use of partially hydrogenated vegetable oil. Although saturated fat, cholesterol, and other factors are also major causes of heart disease, we focus now on trans fat because the FDA could largely eliminate it from the food supply easily and quickly.

A clear scientific consensus holds that trans fat raises LDL-cholesterol levels, thereby increasing the risk of heart disease, the leading cause of death in the United States. In addition, the 2000 Dietary Guidelines Advisory Committee, American Heart Association, National Cholesterol Education Program, Institute of Medicine, and Food and Drug Administration have concluded that trans fat lowers HDL-cholesterol, a blood lipid associated with a reduced risk of heart disease. Furthermore, as the FDA has recognized, several prospective cohort studies provide indirect evidence that trans fat may increase the risk of heart disease beyond its impact on cholesterol.

The Institute of Medicine has recommended that consumption of trans be reduced to the greatest extent possible (without undermining the nutritional quality of the diet). Judging from data in FDA's labeling rule, trans fat likely causes upwards of several thousand deaths per year. We support trans-fat labeling, but that measure alone will not achieve the goal of minimizing the consumption of trans fat from the use of partially hydrogenated vegetable oil in packaged foods. Nor will labeling minimize trans fat in restaurant foods, which are not covered by the labeling law and which often contain large amounts of trans fat.

Fortunately, more-healthy alternatives are available for virtually all commercial food applications in which partially hydrogenated vegetable oils are now used. Indeed, in many categories of food (for example, deep-fried restaurant foods, chips, cookies, and crackers), some brands use partially hydrogenated oils, but competing brands use more-healthy oils. Thus, it is practicable, both technologically and economically, for food manufacturers and restaurants to produce foods without partially hydrogenated oils.

We urge the FDA to recognize that partially hydrogenated vegetable oil is not "Generally Recognized As Safe," but a harmful ingredient that should be eliminated as fully and quickly as possible. We urge the FDA promptly to initiate regulatory proceedings to achieve that goal. Simultaneously, the FDA should strongly encourage and assist food processors and restaurants to switch to the most healthy oils possible.

Sincerely,

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