



CALIFORNIA PISTACHIO
COMMISSION

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November 15, 2002

Michael A. Adams, Ph.D.
Acting Director, Division of Nutrition Science and Policy
Office of Nutritional Products Labeling & Dietary Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
Harvey W. Wiley Federal Building
5100 Paint Branch Parkway
College Park, MD 20740

ATTENTION: Docket #02P-0292

Dear Dr. Adams:

The attached document provides comments endorsed by the California Pistachio Commission regarding a petition filed with your office by the California Walnut Commission entitled, "Health Claim Petition: Diets Including Walnuts Can Reduce the Risk of Heart Disease."

The California Pistachio Commission is a member of the International Tree Nut Council Nutrition Research and Education Foundation (INCNREF), which submitted a separate petition to your office soliciting approval of a health claim on the ability of *all* common nuts to reduce the risk of CHD. The INCNREF petition applies to almonds, Brazil nuts, cashew nuts, hazelnuts, macadamia nuts, pecans, pine nuts, peanuts, pistachio nuts and walnuts.

We believe that the totality of scientific evidence supporting the cardioprotective properties of nuts as a group provides compelling evidence that a health claim should be authorized. In addition, we believe that the totality of observational and clinical data provide stronger evidence of the ability of nuts generally to reduce the risk of CHD, than the walnut data in isolation provide for walnuts alone.

The California Pistachio Commission strongly recommends that FDA authorize a single health claim for all nuts as requested in the petition submitted by INCNREF.

Respectfully submitted,

Kathleen McMahon, PhD, RD
Consultant on behalf of the California Pistachio Commission

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