



April 16, 2003

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

Dear Dr. McClellan:

On behalf of U.S. soybean farmers, the American Soybean Association (ASA) would like to bring to your attention recent consumer research commissioned by the International Food Information Council Foundation. The research is entitled "Impact of Trans Fat Label Information on Consumer Food Choices" and was conducted to measure consumer interpretation and use of the proposed trans fat footnote. This research has been shared with the Food and Drug Administration.

The research showed that inclusion of the proposed trans fat footnote goes beyond informing consumers to include trans fat as a factor in their nutrition selection. It conveyed that trans fat be considered as the primary factor in their decision-making, often at the exclusion of other components. As a result, in the presence of the trans fat footnote, when asked to identify the healthier product, consumers selected the product with a less healthful fatty acid profile over a product that contained some trans fats.

Further, when consumers were asked why they chose the trans fat-free product as the healthier choice when the footnote was present, they almost always cited the trans fat content, overlooking information about calories, total fat, sodium, saturated fat, cholesterol or other components. They tended to say the footnote conveyed that trans fat is very unhealthy and should be avoided.

ASA continues to support policy initiatives designed to improve health. We urge the Food and Drug Administration to ensure that any footnote for trans fat not mislead or confuse consumers into making less healthy food choices.

Sincerely,

*Dwain Ford*

94P-0836 Dwain Ford  
President

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