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Kathleen C. Ellwood, Ph.D. Center for Food Safety and Applied Nutrition Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20749 UNITED STATES

Dear Dr. Ellwood:

I strongly support the health claim petition submitted by the International Tree Nut Council (Docket 02P-0505) that requests tree nuts and ground nuts be permitted to assert the fact that they reduce the risk of coronary heart disease (CHD).

I have devoted a considerable portion of my research program during the past decade to exploring the effect of nuts and other components of a Mediterranean-type diet on CHD. One of my early studies (Jenkins et al., 2001) in this area showed that a diet consisting largely of leafy and other low-calories vegetables, avocado, fruits and nuts (almonds and hazelnuts) resulted in significantly improved risk factors for CHD compared with a similar very low saturated fat diet when fed in a randomized, crossover design study.

Additional studies from my laboratory and with colleagues from other centers investigated the effect of a single nut (almonds) on CHD-risk factors (Spiller, et al., 1992; Spiller et.al., 1998; and Jenkins, et.al., 2002). These studies consistently showed that feeding reasonable amounts of almonds resulted in significant decreases in serum total cholesterol and LDL-cholesterol compared to control diets in subjects with both normal and raised LDL-cholesterol levels. The most recent study (Jenkins, et.al., 2002) showed a dose-response to almond feeding in these CHD biomarkers.

A review of the literature in this area reveals numerous other intervention studies that have reported similar benefits of nut feeding on CHD-related risk factors. In addition, the epidemiologic data are exceptionally consistent that subjects who regularly included nuts in their diet experienced remarkably less mortality from CHD compared to people who did not report eating nuts.

I believe a message directed to consumers suggesting that nuts can be a healthy part of a heart-healthy diet is more than justified by the available literature. Furthermore, because most people like nuts, the opportunity for such advice to be put into practice seems much greater than some other dietary recommendations (e.g. "Eat more fruit and vegetables," where we are having less success and must therefore continue to work harder).





In summary, the science is very strong that incorporating nuts into the diet on an ongoing basis is likely to have significant public health benefits, and I strongly encourage swift and favorable consideration of the INC petition by your office.

Sincerely,

David J.A. Jenkins, MD, PhD, DSc Professor

References:

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