



American Bakers Association

Serving the Baking Industry Since 1897

Lee Sanders, Vice President, Regulatory & Technical Services

lsanders@americanbakers.org

TO: Susan Thompson
FROM: Lee Sanders *LS*
Subject: ABA Trans Fat Comments

Date: August 10, 2000

This memorandum is to document more specifically the ABA position stated at page 11, number 7 of the trans fat comments. Specifically, the ABA comment identified two contexts in which the statement, "not a significant source of trans fat" would appear in connection with the ingredient statement of a food:

1. The statement should be required for foods bearing "trans fat free" claims and for which listed ingredients appear to provide trans fat.
2. The statement should be permitted on a voluntary basis for foods that, while not necessarily qualifying for a "fat free claim," contain levels of trans fat that are below the level triggering mandatory nutrition labeling. ABA has advocated a trigger level greater than 1 gram of trans fat per reference amount. Levels of trans fat up to 1 gram are immaterial, as discussed in the ABA comments, and ingredients providing immaterial amounts of trans fat are properly described by the phrase, "not a significant source of trans fat."

Should you have further questions regarding ABA's comments, please don't hesitate to contact me.

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FOOD AND DRUG ADMINISTRATION #10 :04
OFFICE OF NUTRITIONAL PRODUCTS,
LABELING AND DIETARY SUPPLEMENT
(ONPLDS)
200 C STREET SW (HFS-800)
WASHINGTON, DC 20204

ONPLDS Fax: 202 205 5532 ONPLDS Voice: _____

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TO: Lee Sanders, Amy Baker

FAX NUMBER: 202 898 1164 VOICE NUMBER: _____

re: C 2113

FROM: Susan Thompson

Thank you for your comment on trans fat.

I'd like clarification on p. 11, *7, the last sentence

"In addition, we believe that this kind of disclosure
statement should be permitted on a voluntary basis
for products containing levels of trans fat that are
insufficient to trigger mandatory nutr labeling"

Do you mean the disclosure statement (not a sig. source of trans

should be allowed when there's no "trans fat free" claim + no
listing of trans in the nutrition label? thanks for your help

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69 when no claim + listing

Susan Thompson

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