



United States Department of Agriculture
Human Nutrition Research Center on Aging
At Tufts University

Office of the Director

February 12, 2003

Kathleen C. Ellwood, Ph.D.
Acting Director, Division of Nutrition Science and Policy
Office of Nutritional Products, Labeling and Dietary Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20749

Re: Docket 02P-0505

Dear Dr. Ellwood:

I submit this letter to express my support for the health claim petition submitted to your office by the International Tree Nut Council (INC) requesting authorization of the claim, "Diets containing one ounce of nuts per day can reduce your risk of heart disease." In my opinion, this claim would provide Americans with important information that has the potential to be of considerable public health benefit.

The evidence linking nut consumption with reduced risk of coronary heart disease (CHD) is based on a body of consistent observational data as well as a number of intervention trials. Epidemiological studies show regular nut consumers experience a 30-50% reduction in the relative risk of CHD compared to non-nut consumers. The available clinical data show that feeding nuts significantly lowers the concentration of total cholesterol as well as LDL-cholesterol in healthy subjects. The biological basis of these cardioprotective actions appears due to nutrients and phytochemicals rich in nuts, including antioxidants, arginine, folate, copper, magnesium, fiber, phytosterols, and polyphenols. Taken together, these data should be sufficient for FDA to authorize the proposed claim.

Obesity is one of the most pressing public health concerns in the United States because of its many comorbidities (including CHD). However, based on data summarized in the INC petition, it seems unlikely that consumers who include one ounce of nuts in their daily diet will be placed at undo risk of weight gain. Clearly, nutrition education will be important in this area, but the fact that nuts are an energy dense food does not alter the fact that they are likely to reduce the risk of CHD as the proposed claim states.

In summary, I strongly recommend your office grant the INC petition by issuing an interim final rule permitting immediate use of the proposed claim.

Sincerely,

Jeffrey B. Blumberg, Ph.D., F.A.C.N.
Associate Director and Professor
Chief, Antioxidants Research Laboratory

02P-0505

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