Public Health Service

Food and Drug Administration College Park, MD 20740

APR 1 0 2003

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Lyman S. Stanton 800 Las Trampas Road Lafayette, CA 94549

Dear Mr. Stanton:

I am responding to your letter to the Office of Nutritional Products, Labeling, and Dietary Supplements in the Center for Food Safety and Applied Nutrition. You express confusion about the labeling of dietary fat. In particular, you ask why the sum of the three fatty acids (i.e., saturated, monounsaturated, polyunsaturated) listed in the Nutrition Facts of the margarine that you use is less than the amount listed for "Total Fat."

As we discussed in our conversation of March 21, the monounsaturated and polyunsaturated fatty acids listed in Nutrition Facts are fatty acids having double bonds in a *cis*-configuration. Fatty acids having double bonds in a *trans*-configuration are not listed. For this reason, the sum of the fatty acids listed on your margarine label is not equal to the amount listed for "Total Fat."

As I also mentioned to you, the Food and Drug Administration has proposed to require that *trans* fatty acids be listed in "Nutrition Facts" (64 FR 62746, November 17, 1999). I will forward your letter as a comment to the docket on this rulemaking. We are hoping that the final rule is published in the near future.

Thank you for your letter. Please call me at 301-436-1784 if you have more questions.

Sincerely yours,

Sugar Thompson

Susan Thompson, Ph.D. ' Chemist Division of Nutrition Labeling and Programs Office of Nutritional Products, Labeling and Dietary Supplements Center for Food Safety and Applied Nutrition

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