



UNIVERSITY OF
MARYLAND

COLLEGE OF AGRICULTURE AND NATURAL RESOURCES
CENTER FOR FOOD, NUTRITION, AND AGRICULTURE POLICY

1122 Patapsco Building
College Park, Maryland 20742
301.405.8003 TEL 301.405.7979 FAX
cfnap@umd.edu

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European Food Safety Authority

**RE: DRAFT OPINION OF THE SCIENTIFIC PANEL ON DIETETIC PRODUCTS,
NUTRITION AND ALLERGIES (SP/NDA/CLAIMS/WD/1, Rev 3)**

The Center for Food, Nutrition, and Agriculture Policy (“CFNAP”) at the University of Maryland is an independent, non-profit research and education organization dedicated to advancing rational, science-based food, nutrition, and agriculture policy. CFNAP uniquely operates like an independent “think-tank,” while maintaining its academic affiliation with a major land-grant university. The research, education, outreach, and communications activities of the faculty are conducted in a relevant, time-sensitive manner that helps inform the public policy and regulatory processes on food, nutrition, and agriculture issues.

Encompassed in the Center’s activities on food, nutrition, and agriculture policy are its interests in health claims on food packages. The faculty members signing this letter believe that health claims on food packages are one important way to communicate with consumers. The claims should be scientifically accurate and carefully worded to assure that consumers properly understand the health claim.

We respectfully forward this Ceres® White Paper¹ in response to EFSA’s solicitation for comments on its Draft Opinion on scientific and technical guidance for the preparation and presentation of the application for authorization of a health claim on May 16, 2007. The white paper describes a rigorous process developed by the faculty of the Center for Food, Nutrition, and Agriculture Policy to assess the strength of the evidence for making a qualified health claim on a food (tomatoes and tomato products), phytonutrient (lycopene), and disease (prostate cancer).

The CFNAP process is similar to Parts 3 and 4 (Overall Summary of Pertinent Scientific Data and Body of Pertinent Scientific Data Identified, respectively) of the scientific and technical guidance put forward by EFSA’s Scientific Panel on Dietetic Products, Nutrition and Allergies. CFNAP, however, also convened two expert panels as part of the total process. The first expert panel provided advice on our process as a whole and the second expert panel evaluated our assessment of the strength of the scientific data and recommended the language of the qualified health claim based on the totality of the evidence.

¹ Anderson PA, Hein GL, Forshee RA, Storey ML. [A Ceres® White Paper](#) on “A case study in implementing the FDA’s interim guidance for qualified health claims: consumption of tomatoes, tomato products, and/or lycopene and risk of prostate cancer.”

We hope the NDA Panel finds this Ceres White Paper useful as it finalizes its opinion on the important issue of making health claims on food packages.

Sincerely,

Maureen L. Storey, PhD
Director and Research Professor

Richard A. Forshee, PhD
Deputy Director and Director, Research