

U.S. Canola Association 600 Pennsylvania Ave., SE, Suite 320 Washington, DC 20003 Phone (202) 969-8113 Fax (202) 969-7036

September 27, 2012

Department of Agriculture Attention: Eric Edmunds, Canola Hearings Officer 635 Capitol Street NE Salem OR 97301

Dear Mr. Edmunds:

On behalf of the U.S. Canola Association (USCA), I write in support of the Oregon Department of Agriculture's proposed rule to allow limited and controlled canola production in the Willamette Valley. This acreage would help reduce our national deficit in canola production, which is projected to require the U.S. to import over 70 percent of the canola oil consumed domestically in 2012.

Furthermore, U.S. canola oil consumption is expected to continue its recent exponential rise. From 2005 to 2012, domestic consumption increased 245 percent – from 5.5 to 13.5 lbs. per capita – as consumers sought out canola oil's healthy attributes, including the lowest saturated fat level of all common cooking oils. The FDA has issued a qualified health claim on canola oil's ability to reduce the risk of coronary heart disease due to its unsaturated fat content. The trend towards zero trans fat foods has spurred demand for canola oil; some varieties of canola produce highly stable oil that does not require hydrogenation, the process that creates trans fat. Reductions in the use of trans fat in restaurants have also increased canola oil demand. However, U.S. canola production has not matched this increase in domestic canola demand, and food companies are importing the majority of the canola oil consumed.

Heart disease, caused primarily by obesity, is the number one killer in America and canola oil may help reduce the risk of this disease by replacing saturated fat in the diet¹. Taxpayers also have a financial stake in increasing canola production – the cost of obesity was recently estimated to be \$190 billion a year in additional medical spending, or 20.6 percent of U.S. health care expenditures.

Once again, the USCA supports the proposed rule that will allow limited and controlled canola production in the Willamette Valley, a move which will help meet the growing demands of U.S. consumption of canola.

Respectfully yours,

Kevin Waslaski

President, U.S. Canola Association

¹ Limited and not conclusive scientific evidence suggests that eating about 1½ tablespoons (19 grams) of canola oil daily may reduce the risk of coronary heart disease due to the unsaturated fat content in canola oil. To achieve this possible benefit, canola oil is to replace a similar amount of saturated fat and not increase the total number of calories you eat in a day. – U.S. Food and Drug Administration