

INTERNATIONAL
**Food
Additives
Council**

SUITE 500-G • 5775 PEACHTREE-DUNWOODY ROAD • ATLANTA, GEORGIA 30342
(404) 252-3663 • FAX (404) 252-0774 • E-mail: ifac@assnfdq.com

07 28 '04 AUG -9 09:12

August 6, 2004

Division of Dockets Management (HFA-305)
Food and Drug Administration (FDA)
5630 Fishers Lane, rm. 1061
Rockville, MD 20852

RE: Docket No. 1998N-0359 Program Priorities in the Center for Food Safety
and Applied Nutrition; Request for Comments

The International Food Additives Council (IFAC) is a U.S. based international trade organization representing companies who produce high quality substances used worldwide as food additives. IFAC appreciates the time and resources being dedicated to food security and food safety and supports these efforts.

IFAC has long valued the information published in the Food Chemicals Codex (FCC). This compendium, published by the Institute of Medicine of the National Academies and long supported by FDA, contains monographs on the identity and purity of a wide variety of food additives. FCC monographs are a valuable tool in consumer protection, to assist regulatory agencies and the regulated industries producing and using food additives. It is an important element of "Assuring Food Safety and Security."

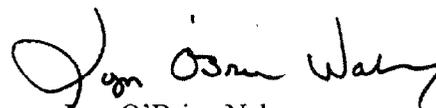
IFAC urges that monographs in the latest edition of the Food Chemicals Codex and its supplements be adopted as official by reference unless otherwise noted and that this be an "A-list" priority. As IFAC has previously commented, such action would be in harmony with the regulatory agencies in Australia, Canada and New Zealand where the specifications in the Food Chemicals Codex and its supplements are official.

In light of the importance of FCC as described above, IFAC again urges FDA to continue its funding of the FCC project with no or very limited interruption in the schedule

In addition, CFSAN's active participation in the Codex Alimentarius Food Standards Programme is extremely important to IFAC. IFAC strongly supports FDA's continued participation and leadership in Codex Alimentarius, its committees and related activities.

IFAC appreciates the opportunity to comment on CFSAN's 2005 priorities.

Respectfully submitted,



Lyn O'Brien Nabors
President

98N-0359

C 113