



NFPA[®]
The Food Safety People

August 24, 2004

Division of Dockets Management
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

NATIONAL
FOOD
PROCESSORS
ASSOCIATION

**Re: Docket No. 2004N-0230; Food; Current Good Manufacturing Practice
Regulations 69 Federal Register 40312; July 2, 2004**

Dear Sir or Madam:

John R. Cady
*President and
Chief Executive Officer*

1350 I Street, NW
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Washington, DC 20005
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The National Food Processors Association (NFPA) is the voice of the \$500 billion food processing industry on scientific and public policy issues involving food safety, food security, nutrition, technical and regulatory matters and consumer affairs. NFPA's three scientific centers and international office (Bangkok, Thailand), its scientists and professional staff represent food industry interests on government and regulatory affairs and provide research, technical assistance, education, communications and crisis management support for the Association's U.S. and international members. NFPA members produce processed and packaged fruit, vegetable, and grain products, meat, poultry, and seafood products, snacks, drinks and juices, or provide supplies and services to food manufacturers.

NFPA members are dedicated to the production of safe and wholesome food products; we strongly support adherence to Good Manufacturing Practices (GMPs) as outlined in 21 CFR 110. Given the importance of GMPs in the production of safe food, we strongly believe that this modernization process, along with any changes to the GMPs, be given in-depth consideration. We therefore request a 60-day extension of the comment period, from September 10 until November 9, 2004.

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FDA noted in the announcement of its public meetings on GMP modernization that in the almost 20 years since the GMPs were last revised, the food industry has undergone considerable change that warrants re-looking at the GMPs. FDA raised a number of thought-provoking questions about how 21 CFR 110 should be revised or otherwise modernized. In support of its position to modernize the GMPs, FDA recently made available on its website two reports:

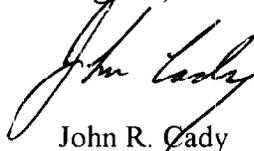
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- Food GMP Modernization Working Group: Report Summarizing Food Recalls, 1999-2003 (August 3, 2004)
- Good Manufacturing Practices (GMPs) for the 21st Century - Food Processing (August 9, 2004).

The latter report is quite extensive (four sections and multiple appendices) and raises a number of issues that warrant consideration – both problems and potential solutions that may or may not require changes to the GMPs. NFPA members request appropriate time to review the materials FDA has provided and discuss whether the suggested approaches are appropriate or feasible. It is important to consider alternative approaches and ensure that any changes made will be effective in resolving the identified problem. Since some of the information was only made available August 12 and many of our members are occupied with vacations, back-to-school preparations and the upcoming Labor Day holiday, they have had insufficient time to analyze the information and provide the necessary input. Therefore, we strongly urge the Food and Drug Administration to provide additional time for us to develop comments on the FDA questions set forth in the *Federal Register* in light of the additional information FDA has provided.

Regards,



John R. Cady