



North American Millers' Association

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September 10, 2004

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Re: Docket No.2004N-0239: Proposed Revisions to the Current Good Manufacturing Practices

To whom it may concern:

The North American Millers' Association (NAMA) appreciates the opportunity to comment on the work of the Food and Drug Administration to modernize the Current Good Manufacturing Practices (GMP's) for food. NAMA is the trade association representing the wheat, corn, oat and rye milling industry. NAMA's 46 member companies operate 168 mills in 38 states and Canada. Their aggregate production of more than 160 million pounds per day is approximately 95 percent of the total industry capacity.

Sanitation of our mills is of utmost importance to our members. The first sentence of A Flour Mill Sanitation Manual, the industry handbook on sanitation states, "No flour mill can stay in business without an effective, practical sanitation program." The GMP's are one of many tools our members use to ensure the integrity of the food supply.

In our view, the FDA should be careful not to expand the GMP's to encompass more programs or controls than they were initially designed to control. The GMP's are a prerequisite to an effective Hazard Analysis Critical Control Points (HACCP) program. Other components of the food safety protocol, including separate programs for allergens, recalls, and pest control are also integral parts of HACCP. Allowing each program to serve its own individual purpose ensures that the programs can be tailored to the needs of each sector of the food processing industry.

It is important that the GMP's remain a flexible tool that guides but does not restrict companies from producing a quality food supply for customers. The FDA should avoid adding additional food safety programs into the GMP's. If you have any questions about these comments or would like further information, please contact Jane DeMarchi at 202-484-2200, ext. 109 or jdemarchi@namamillers.org.

Sincerely,
Betsy Faga

A handwritten signature in black ink, appearing to be 'Betsy Faga', written over a horizontal line.

President