

INTERNATIONAL  
**Food  
Additives  
Council**

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Food and Drug Administration  
5630 Fishers Lane, rm. 1061  
Rockville, MD 20852

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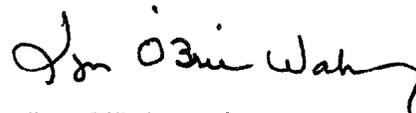
The International Food Additives Council (IFAC) is a U.S. based international association representing companies who produce high quality substances used as food additives. A number of IFAC members have been asked by customers to provide their facility registration numbers and IFAC requests that FDA confirm that there is no requirement to comply with such a request, discourage food manufacturers from insisting that their suppliers provide their registration numbers and thereby provide suppliers with a rationale and FDA backing for not doing so.

It is IFAC's understanding that registration numbers are confidential, protected by password and pin numbers and there would, therefore, be no way for a customer to confirm the accuracy of a registration number. Some customers have stated that they believe that FDA will conduct audits to assure that companies are only dealing with registered suppliers. IFAC has seen nothing in FDA documents concerning facility registration to indicate that the agency would indeed conduct such audits. And, it is our understanding that if FDA conducted such an audit there is no sanction that FDA could impose if customers failed to possess such proof. Furthermore, if proof of registration were desired of company suppliers, a general warranty of registration should suffice since the customer is in no position to confirm the accuracy of the registration number in any event. In either case, FDA could check its database to verify a supplier's registration.

In response to an IFAC question concerning the above, on January 10, 2004, [FURLS@FDA.GOV](mailto:FURLS@FDA.GOV) stated "The FDA does not regulate NOT to give out your registration number" and "We advise that you do not give your registration number out for unnecessary purposes." It is our understanding that the only necessary purpose of disclosing a registration number is in connection with the listing of a foreign manufacturing facility in a prior notice of import for a food shipment.

IFAC requests that the FDA clarify this situation making it clear that there is no legal or regulatory need for a food manufacturer to have its supplier's registration number(s).

Respectfully submitted,



Lyn O'Brien Nabors  
President

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