



International Dairy Foods Association
Milk Industry Foundation
National Cheese Institute
International Ice Cream Association

August 24, 2004

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

**Re Docket No. 2004N-0230, CFSAN, Food; Current Good
Manufacturing Practice Regulations; Request for Comments**

Dear Sir or Madam:

The International Dairy Foods Association (IDFA) is requesting an extension of 60 days for the written comment period on Good Manufacturing Practices (GMPs). This request would establish a comment period closing date of November 9, 2004, instead of the current September 10, 2004. This request is submitted on behalf of IDFA and its constituent organizations, the Milk Industry Foundation, the International Ice Cream Association, and the National Cheese Institute. The approximately 500 member companies of these associations operate more than 650 processing and manufacturing plants, which account for 85% of the dairy products consumed in the United States.

A number of reasons exist for the Center for Food Safety and Applied Nutrition (CFSAN) and the U.S. Food and Drug Administration (FDA) to extend the comment period, as listed below.

- FDA representatives stated at the public meeting in Washington, DC that studies were being conducted on food safety issues related to GMPs, but the information was not yet available. This information was just released via the FDA website without any formal notice to interested parties such as IDFA and is critical for the U.S. food industry to formulate comments. The amount of information contained in these recent releases make it very difficult to finalize comments that are valuable, meaningful and applicable by the September 10th deadline.
- Extending the deadline should improve the quality and content of the comments; thereby, speeding up the CFSAN comment review process and allowing FDA to move forward more quickly with a Federal Register notice on draft GMP modifications

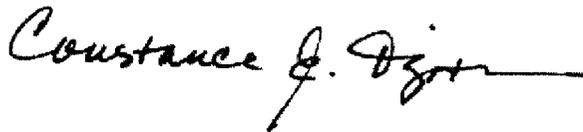
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- The Federal Register notice included an extensive list of questions to be addressed by any commenter. IDFA needs adequate time to completely involve and organize its members, schedule conference calls and meetings to gather views and develop a comment paper. Considering the challenges created by having the current comment period primarily in the summer months, organizing our members has resulted in some scheduling difficulties because of vacations and holidays.
- This intent to modify the long-standing FDA food GMPs, which are the primary basis for inspection of dairy plants by FDA will have a significant impact on internal food safety programs and the industry needs time to establish its views on modification of the GMPs.
- The potential economic impact to the dairy industry may be significant, depending on how the FDA food GMPs are modified. This could have a serious negative financial impact on the dairy industry, without measurable food safety benefits. The industry needs additional time to sufficiently analyze the financial effects of specific modifications, prior to making recommendations.

IDFA looks forward to continuing its cooperative working relationship with CFSAN and FDA, by strongly encouraging a 60 day extension of the comment period for modification of FDA's food GMPs. We would welcome the opportunity to discuss this extension request further and be willing to answer related questions or provide additional information.

Respectfully submitted,



Constance E. Tipton
President & CEO

cc: D. Zink, CFSAN
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