

August 7, 2006

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

RE: Docket #2006P-0101

Dear Sirs:

On behalf of the National Association of State Departments of Agriculture, comprised of the commissioners, secretaries and directors of agriculture in the 50 states and four U.S. territories, we urge your favorable consideration of Docket #2006P-0101, **Petition for Review of Codex Standard for Honey Under 21 CFR 130.6**. The petition was filed by the American Beekeeping Federation, et al.

All packaged food sold in the United States must bear a statement of identity on the principal display panel of the food (21 CFR 101.3). For non-standardized foods (i.e. products without standards of identity promulgated by the FDA), the name used as the statement of identity must be either the "common or usual name" of the food (i.e. "Honey" is the common or usual name of the food known as 100% Honey) or an appropriately descriptive name that is not misleading. The statement of identity for honey blend type sweeteners is confusingly similar to the statement of identity for 100% pure honey.

NASDA urges FDA to adopt certain provisions of the Codex Standard for Honey [CODEX STAN 12-1981, Rev.2 (2001)], pursuant to 401 of the Federal Food Drug and Cosmetic Act. Upon adoption of these standards, NASDA urges that foods which do not conform to the Honey Codex Standard (by virtue of added ingredients or modifications) be required to be distinguished from "Honey" through non-misleading common or usual name labeling, as would be the case for a food with a standard of identity.

Thank you for your attention to this issue.

Sincerely,



J. Carlton Courter, III
Commissioner
NASDA President



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