



August 15, 2005

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

Re: Docket No. 1995N-0294

Dear Sir or Madam:

The Chocolate Manufacturers Association (CMA) appreciates this opportunity to comment on the proposed rule on "Food Standards; General Principles and Food Standards Modernization." 70 Fed. Reg. 29214 (May 20, 2005).

CMA is the national not-for-profit association representing the majority of chocolate manufacturers in the United States. CMA members produce over 90 percent of all chocolate manufactured in this country. In addition to supplying the trade with bulk chocolate products, CMA members also manufacture and market a wide variety of finished chocolate and chocolate-containing products for the consumer market.

CMA strongly supports the existence of food standards. As FDA has stated, the purpose of a standard of identity is to promote honesty and fair dealing in the interest of consumers. Federal food standards protect consumers by ensuring that products that they purchase are what they are expecting. Moreover, food standards protect manufacturers by providing a level playing field for the manufacturing of standardized products. For these and other reasons, CMA strongly supports the existence of food standards, and believes that they should be aggressively enforced.

CMA also supports FDA's efforts to create a set of general principles for food standards. In order for food standards to effectively fulfill their purpose described above, they must be easy-to-follow, and must not stifle food technology innovations that are consistent with protecting consumers and manufacturers. CMA believes that having a set of general principles to guide FDA and industry will facilitate the development of new standards and the modernization (or elimination) of outdated, existing standards.

CMA appreciates the opportunity to provide these comments to this proposed rulemaking. Should you require additional information, please do not hesitate to contact us.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Lynn M. Bragg', is written over a horizontal line.

Lynn M. Bragg, President
Chocolate Manufacturers Association

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C98