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July 27, 2000

Dockets Management Branch
HFA - 305
Food and Drug Administration
5630 Fishers Lane
Rockville, Md. 20852

Docket No. 00N-1262
65 Federal Register 45280

Dear Sir/Madam:

We are writing to offer comments in reply to the May 5, 2000 notice in the Federal Register seeking comments on "Improving Premarket Review and Approval of Food and Color Additives".

IACM is the trade association representing both domestic and foreign manufacturers of certified and exempt colors. We are pleased to have the opportunity to offer these comments:

- Color additive petitions will likely grow in future years as new colors and new uses for existing colors are developed. Because these colors are added as an ingredient to a wide range of foods, drugs and cosmetics, they have a consumer and economic impact far beyond the market for the color per se. Accordingly, it is appropriate that color additives receive no less priority than food additive petitions.
- FDA is unnecessarily complicating its task in considering color additives by holding those colors intended largely for external use (the D&C colors) to the same safety paradigm as colors intended for internal use (FD&C colors). We would welcome the opportunity to work with the agency to develop appropriate safety standards for D&C colors.
- The longstanding proposal to permanently list color lakes is still pending, and we note with pleasure that this proposal is now on the CFSAN priority list. We encourage the FDA to complete this effort that has been pending for more than thirty years.

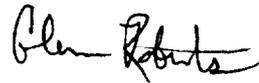
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We appreciate having the opportunity to offer these thoughts, and are available to discuss them in more detail at your convenience. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Roberts". The signature is written in a cursive style with a prominent initial "G".

Glenn Roberts
Executive Director

IACM



*International Association
Color Manufacturers*

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