



SNACK FOOD ASSOCIATION

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January 4, 2000

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

Re: Docket No. 94P-0036; Food Labeling: Trans Fatty Acids in Nutrition Labeling, Nutrient Content Claims and Health Claims (November 17, 1999) – Request for Extension of Comment Period

Dear Sir or Madam:

On behalf of the Snack Food Association, I am writing to respectfully request a 90 day extension to comment on the Food and Drug Administration's (the agency) proposed rule, Food Labeling: Trans Fatty Acids in Nutrition Labeling, Nutrient Content Claims and Health Claims published in the *Federal Register* on November 17, 1999.

The Snack Food Association (SFA or the association) is an international trade association representing more than 800 snack manufacturers and suppliers to the snack industry. Snacks produced and sold by SFA members include potato chips, tortilla chips, corn chips, crackers, pretzels, popcorn, extruded snacks, meat snacks, pork rinds, snack nuts, party mix, and other savory snacks. Retail sales of snack foods in the U.S. total more than \$18 billion.

SFA has been closely monitoring the agency's work on trans fatty acids for the last several years. We have anticipated that this rule would have a major impact on our industry because certain types of snack foods may contain trans fatty acids. Although our members have long supported an informative nutrition facts panel, they do want to work with the agency to present information in a way that is meaningful to consumers and cost effective for snack food manufacturers.

94P-0036

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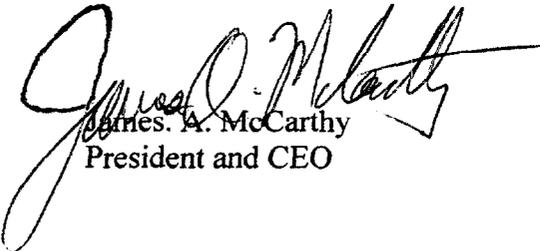
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The majority of snack food manufacturers are regional, mid-size to small businesses with very limited staff. As a result, it is impossible to generate the information the agency requests regarding the proposed labeling requirement in the 90 day comment period provided. Additionally, due to the importance of this issue to SFA members, the association's Board of Directors will consider this issue, but cannot do so until their next meeting scheduled for March 25, 2000.

The Snack Food Association intends to provide the Agency with detailed information on the economic impact of the proposed rule, including an assessment of the implementation costs relative to the length of the implementation period. Additionally, we are gathering comments on the effect of combining trans fatty acids and saturated fats on nutrient content claims.

SFA appreciates your consideration of our request for a 90 day extension to the comment period on the proposed trans fatty acid labeling requirement.

Sincerely,



James A. McCarthy
President and CEO



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