



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

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

Subject: Docket No. 02D-0515 Guidance for Industry: Qualified Health Claims in the Labeling of Conventional Foods and Dietary Supplements

To the Dockets Management Branch:

The International Dairy Foods Association (IDFA) is writing to notify the Food and Drug Administration (FDA) that it is joining the request from the Grocery Manufacturers of America (GMA) and five other food trade associations that FDA consider a proposal for regulations to establish a premarket notification program for qualified health claims for food labeling. IDFA fully endorses GMA's comments on "Proposed FDA Regulation to Establish a Premarket Notification Program for Qualified Health Claims for Food Labeling," filed to the docket earlier this month.

IDFA represents the nation's dairy processing and manufacturing industries and their suppliers, is composed of three constituent organizations: the Milk Industry Foundation (MIF), the National Cheese Institute (NCI) and the International Ice Cream Association (IICA). Its 500-plus members range from large multinational corporations to single-plant operations, representing more than 85% of the volume of milk, cultured products, cheese, and ice cream and frozen desserts produced and marketed in the United States -- an estimated \$70-billion a year industry

IDFA believes that GMA's proposed premarket notification for qualified health claims will provide an effective, efficient and transparent process to review potential health

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claims that do not meet the statutory standard of "significant scientific agreement" but that do meet the standard of credible evidence established by the Pearson litigation.

IDFA applauds the FDA's effort on its new initiative Consumers Health Information for Better Nutrition. We believe that FDA's guidance on qualified health claims can be enhanced with the proposed premarket notification process thus resulting in approach that will encourage the flow of high-quality science based information regarding the health benefits of conventional foods.

IDFA appreciates the opportunity to comment on the qualified health claim guidance and would welcome the opportunity to discuss these issues. We are also glad to answer questions or provide additional information.

Respectfully submitted,



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