



GROCERY MANUFACTURERS OF AMERICA
MAKERS OF THE WORLD'S FAVORITE BRANDS OF
FOOD, BEVERAGES, AND CONSUMER PRODUCTS

April 20, 2005

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

REQUEST FOR EXTENSION OF COMMENT PERIODS

Docket No. 2004N-0463 Food Labeling; Prominence of Calories
Docket No. 2004N-0456 Food Labeling: Serving Sizes of Products that can reasonably be consumed at one eating occasion; updating of reference amounts customarily consumed; approaches for recommending smaller portion sizes

Dear Sir or Madam:

The Grocery Manufacturers Association (GMA) request an extension of 60 days to August 20, 2005 for the comment periods on the two (2) above referenced Advanced Notices of Proposed Rulemaking.

GMA urges the Agency to allow sufficient time for all stakeholders, including the food industry, to have the opportunity to review the newly released USDA Food Guidance System. The new program, MyPyramid, provides recommended serving sizes for the five different food groups. These recommended serving sizes found in MyPyramid, have significant importance when considering changes to the RACCs.

GMA has previously stated in comments submitted during the 2005 Dietary Guidelines process and during the revision of the Food Guide Pyramid that it is imperative that the federal government speak with one voice and issue consistent nutritional and health recommendations. By doing so, this will reinforce the nutrition recommendations for Americans and help consumer understanding about the potential for achievable improvements in their health.

On a daily basis, consumers reach for food and beverage products that carry food labels bearing a Nutrition Facts Panel. GMA is interested in making sure that changes to the Nutrition Facts Panel will be ones that improve communications with consumers. Will these changes in the food label reflect federal nutrition recommendations?

GMA wants to work with the Agency to meet the needs of consumers concerning calories, single serving packages and serving size (RACCs). Therefore, GMA respectfully requests an extension of the comment periods of the April 6 ANPRs to August 20, 2005.

Thank you for your consideration of this critical issue to our industry.

Sincerely,

A handwritten signature in black ink that reads "Alison J. Kretser". The signature is written in a cursive style with a large, sweeping flourish at the end of the name.

Alison J. Kretser MS, RD
Senior Director, Scientific and Nutrition Policy