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Pamela G. Bailey  
President & CEO

November 10, 2006

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

**Re: Docket Number 2006N-0107 - FDA-Regulated Products Containing Nanotechnology Materials**

Dear Sir or Madam:

These comments are submitted on behalf of the Cosmetic, Toiletry, and Fragrance Association (CTFA). CTFA is the national trade association representing the cosmetic and personal care products industries. Founded in 1894, CTFA has almost 600 members whose businesses formulate, manufacture, distribute and market personal care products. Our members manufacture or distribute the vast majority of personal care products sold in the United States.

CTFA appreciates this opportunity to provide additional comments concerning the use of nanotechnology materials in FDA regulated products, specifically our comment filed in response to the citizen petition filed by the International Center for Technology Assessment and other parties<sup>1</sup>. The CTFA response contains detailed information on the scientific and regulatory issues surrounding the incorporation of nanotechnology in personal care products generally and sunscreen drug products specifically. We urge FDA to thoroughly evaluate this submission, as well as our comments during the closed and open part of the October 10<sup>th</sup> meeting transcript as

<sup>1</sup> Submitted on September 19, 2006, in regard to Docket Number 2006P-0210: Petition to FDA to Amend its Regulations for Products Composed of Engineered Nanoparticles Generally and Sunscreen Drug Products Composed of Engineered Nanoparticles Specifically.

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part of the Agency's review of this issue. We continue to believe that FDA has ample regulatory authority over the use of nanotechnology materials in cosmetics and OTC drug products. Due to the combination of FDA oversight and a history of successful industry self-regulation, consumers have enjoyed safe and beneficial personal care products for decades. We believe that FDA's existing authority is more than adequate to account for any relevant considerations introduced by nanotechnology.

With every technological advance, new scientific principles and challenges are introduced. But as they have in the past, FDA's existing regulatory systems will continue to ensure that personal care products are safe. Nanotechnology is no exception. Nanotechnology offers enormous potential to enhance the lives of consumers through a wide array of applications, from medical products to industrial technology to personal care products. CTFA supports continued scientific research and investigation into nanotechnology. Nevertheless, CTFA believes that FDA's existing regulations and policies are more than sufficient to ensure that cosmetics and OTC drug products in the United States continue to be safe and beneficial to consumers. Please feel free to contact us if you need additional information.

Respectfully submitted,

*Elizabeth H. Anderson*

Elizabeth H. Anderson  
Executive Vice President -  
Legal & General Counsel

Enclosures