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December 13, 2007

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

REQUEST FOR EXTENSION OF COMMENT PERIOD

RE: [Docket No. 2006N-0168] Food Labeling: Revision of Reference Values and Mandatory Nutrients; Advance Notice of Proposed Rulemaking 72 FR 62149 (November 2, 2007)

Dear Sir/Madam:

The Grocery Manufacturers/Food Products Association (GMA/FPA) represents the world's leading food, beverage and consumer products companies. The association promotes sound public policy, champions initiatives that increase productivity and growth and helps to protect the safety and security of the food supply through scientific excellence. The GMA/FPA board of directors is comprised of chief executive officers from the Association's member companies. The \$2.1 trillion food, beverage, and consumer packaged goods industry employs 14 million workers, and contributes over \$1 trillion in added value to the nation's economy.

GMA/FPA respectfully requests that FDA extend the comment period for the docket noted above for an additional ninety days, until April 30, 2008. Extending the comment period to allow a total of 180 days would permit the interested public to respond fully to the questions contained in the Advance Notice of Proposed Rulemaking (ANPRM).

GMA/FPA and its member companies have been deeply involved with issues related to nutrition labeling since the voluntary program began in 1973; and with issues related to mandatory nutrition labeling and nutrition and health claims with and since the passage of the Nutrition Labeling and Education Act of 1990. GMA/FPA notes that the issues contained in the ANPRM are not straightforward, are quite complex, and require very thorough discussion, deliberation, and modeling to develop responses to questions that will

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affect the future of required nutrition labeling and the relationship of these regulations to nutrition and health claims. The ninety day comment period that spans over the end-of-year holidays greatly hampers the time required for ample discussion to provide the Agency with comprehensive comments.

We have a long-held position that there should be full coordination between the Nutrition Facts panel, MyPyramid food guidance system, and the Dietary Guidelines for Americans. Our desire is for GMA/FPA's comments on the important questions contained in the ANPRM to thoroughly reflect our members' long experience with development, formulation, labeling, and marketing of food products and delivery of nutrition information. Comprehensive and meticulous deliberations are required to formulate responses to the Agency's 75 questions (in 6 sections) that will shape future regulations related to mandatory nutrition labeling of foods.

For the reasons noted above, GMA/FPA respectfully requests that FDA extend the comment period until April 30, 2008. Additionally, we ask that the Agency act promptly on this request for extension of the comment period, so that all stakeholders can optimize their time in preparing comments to the Agency.

Sincerely,



Craig Henry, PhD
Senior Vice President and Chief Operating Officer
Scientific and Regulatory Affairs