



National Confectioners Association
NCA

Representing the Candy, Chocolate & Gum Industries since 1884

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March 19th, 2007

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

807 MAR 22

RE: Docket No. 2007P-0085 -- Adopt Regulations of General Applicability to all Food Standards that would Permit Deviations from the Requirements of the Individual Food Standards of Identity

The National Confectioners Association (NCA) is the not-for-profit trade association representing the confectionery industry. Our members include 400 manufacturers of candy, chocolate and chewing gum and the suppliers and brokers that support those companies. Some of our members manufacture chocolate from cocoa beans. Over 200 of our manufacturing members use chocolate in the production of their candy products. About half of candy retail sales in the US are for chocolate products.

Our members are aware of the Citizen's Petition submitted by GMA/FPA, the Chocolate Manufacturers Association, and 9 other food trade associations. We are in the process of evaluating the intended impact on standardized foods, specifically cacao products under 21 CFR Part 163. For these products, especially sweet chocolate, milk chocolate and perhaps chocolate liquor, the impact is potentially very significant in that the petition would allow the addition of vegetable fat based cocoa butter substitutes and non-nutritive, non-carbohydrate sweeteners.

NCA intends to work with our members to determine their position with regard to proposed changes to the standards of identity for cacao products. NCA will submit further comments upon the conclusion of this effort.

Respectfully submitted,

Lawrence T. Graham
President

2007P-0085

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