

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

FSIS Docket Clerk
Docket No. 95-051P
Rm. 102, Cotton Annex Bldg.
300 12th St. SW
Washington, DC 20250-3700

Re: Docket No. 1995N-0294; Docket No. 95-051P Food Standards; General Principles and Food Standards Modernization
70 Federal Register 29214, May 20, 2005

Dear Sir or Madam:

General Mills (GMI) submits these comments in response to the Food and Drug Administration's (FDA) and U.S. Department of Agriculture Food Safety and Inspection Service (FSIS) Proposed Rule on Food Standards; General Principles and Food Standards Modernization, 70 FR 29214, May 20, 2005.

GMI is a Delaware Corporation with its general offices at Number 1 General Mills Boulevard, Minneapolis, MN 55426. GMI is a major packaged-food manufacturer engaged for over 75 years in the development and production of food products including flour, ready-eat-cereals, yogurt, refrigerated dough products, packaged main dishes, cake and other dessert mixes, soups, vegetables, frozen pizzas, snacks (meat and meatless) and numerous other products.

General Mills supports the agencies efforts to rationalize, modernize and increase the flexibility and efficiency of the food standard process. Specifically, GMI supports the joint FDA and FSIS proposal establishing a set of principles to be used when adding, amending or eliminating food standards. We believe the first four principles to be most important and therefore should be considered mandatory for any submission. The remaining nine principles should be optionally addressed as appropriate while petitioning to add, change or eliminate a food standard. General Mills supports the concept of national food standards and alignment with Codex where appropriate. Therefore, maintaining efficient interstate commerce and international trade should be a consideration when reviewing food standard petitions.

While GMI supports efforts to modernize the current food standards, we believe changes should be the result of action on behalf of interested parties, not from failure to act. Thus, rather than adopt a default position regarding the rationalization of food standards as suggested by FSIS, we would recommend the agency maintain standards and adopt changes only as a result of positive industry or consumer action. This position helps those who may not be able to actively participate in the process and who rely heavily on the food standards.

In accordance with the continued coordination of effort between the agencies, General Mills would encourage the agencies to become more consistent when reviewing new ingredients for standard foods. It should be an accepted practice that when one agency approves a new ingredient to be used, the partnering agency should review and if appropriate approve the use of that new ingredient.

General Mills would like the agencies to more clearly define the proposed process for petitions to establish, amend or eliminate a food standard. We support a clear notification process, when the petition has been submitted, accompanied by a means of ensuring that all interested parties will have an opportunity to comment. The mechanism needs to be transparent and the timing should match the pace at which business moves today. Further, the agencies must develop a process that will quickly advance proposals to a decision point. A lengthy, inflexible process cannot be supported with the limited resources available and will not advance the interests of consumers, industry or the agencies.

General Mills feels strongly that the agencies also must develop a transition process to address current petitions under consideration by the agencies. A plan to expeditiously complete the work on these standards should be included in any proposed process.

General Mills appreciates this opportunity to comment and looks forward to further participating as the agencies refine their proposal.

Respectfully submitted,

M. Elizabeth Westring, Ph.D.
General Mills, Inc.
Vice President, Quality and Regulatory Operations