



AMERICAN FOREST & PAPER ASSOCIATION
Regulatory Affairs

March 6, 2002

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U.S. Department of Health and Human Services
Food and Drug Administration
Dockets Management Branch (HFA-305)
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: American Forest & Paper Association Comments on the Food and Drug Administration Guidance Document entitled "Food Producers, Processors, Transporters, and Retailers: Food Security Preventive Measures Guidance" (Docket No. 01D-0583)

Dear Sir or Madam:

The American Forest & Paper Association ("AF&PA") appreciates the opportunity to submit these comments on the Food and Drug Administration's ("FDA") guidance document entitled "Food Producers, Processors, Transporters, and Retailers: Food Security Preventive Measures Guidance" in response to the notice published in the Federal Register on January 9, 2002 (67 Fed. Reg. 1,224). Two copies of AF&PA's comments are provided.

AF&PA is the trade association and the leading voice of the forest, pulp, paper, paperboard, and wood products industry in the United States. We represent member companies engaged in growing, harvesting, and processing wood and wood fiber, manufacturing pulp, paper, and paperboard products from both virgin and recycled fiber, and producing engineered and traditional wood products. AF&PA members include manufacturers of over 80 percent of the paper, wood, and forest products produced in the United States and our members include small non-industrial private landowners, large multi-product producers, and family-run mills.

AF&PA agrees with the FDA's decision to issue voluntary guidance designed to aid food establishments in taking preventative measures to enhance food security. AF&PA supports the goal of minimizing the risk that food produced, processed, transported, or sold by food establishments will potentially be vulnerable to tampering or criminal or terrorist actions. The guidance sets forth logical, practical, and flexible recommendations for implementing preventative food security measures and procedures. While AF&PA member companies would not fall within the FDA's definition of food establishment, many member companies are manufacturers and suppliers of food packaging. We are aware that some member companies have already taken steps to enhance the security measures and procedures in place at their mills and converting facilities, including implementing many of the guidance document recommendations falling under the heading of "raw materials and packaging." AF&PA member companies support the sensible approach outlined in the FDA guidance document to encourage tighter food security measures and safeguards.

01D-0583

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The FDA's January 9, 2002 notice also requested comments on whether the food establishment guidance document should be revised to address the use of tamper-evident packaging. AF&PA believes that voluntary tamper-evident packaging guidance is not necessary, and if added to the guidance document, it may have the unintended effect of disrupting the manufacturer-customer relationship in developing new packaging innovations. In the packaging industry, the customer (*i.e.*, food establishment) typically works closely in a one-on-one relationship with the manufacturer to design a new packaging product or improve current products. The manufacturer generally prepares the packaging design according to the customer's particular specifications. While a manufacturer, on its own, may initiate new packaging developments, the customer's requirements usually dictate the innovations in packaging designs. AF&PA fears that well-intentioned efforts to standardize tamper-evident packaging may end up stifling new product developments and hindering the traditional marketplace dynamic between a packaging manufacturer and customer.

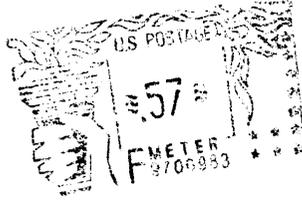
AF&PA appreciates the opportunity to present these comments. Please direct any questions regarding the above comments to me at 202-463-2587.

Sincerely,

A handwritten signature in black ink that reads "John L. Festa". The signature is written in a cursive style with a large, prominent "J" and "F".

John L. Festa, Ph.D.
Senior Scientist

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