



October 1, 2004

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

NATIONAL
FOOD
PROCESSORS
ASSOCIATION

RE: **DOCKET NO: 2004P-0429**
Citizens Petition submitted by the Industry Coalition on 21 CFR Part 11,
dated September 17, 2004.

Dear Sirs/Madam:

The Industry Coalition on 21 CFR Part 11 recently submitted a Citizen's Petition to the Food and Drug Administration for consideration. The National Food Processor's Association (NFPA), a member of this coalition, is in support of this petition.

John R. Cady
President and
Chief Executive Officer

NFPA is the voice of the \$500 billion food processing industry on scientific and public policy issues involving food safety, food security, nutrition, technical and regulatory matters and consumer affairs. NFPA's three scientific centers, its scientists and professional staff represent food industry interests on government and regulatory affairs and provide research, technical services, education, communications and crisis management support for the Association's U.S. and international members.

1350 I Street, NW
Suite 300
Washington, DC 20005
202-639-5917
Fax: 202-637-8464

NFPA would like to add the following examples of food industry recordkeeping requirements comments to the petition:

Page 8, Section titled "Controls Relating to Uniqueness of Signature and "Link" Between Signature and Record" - we also include references to the food regulations...21 CFR Part 106.100, Part 113.83, Part 113.100, Part 114.100, Part 123.9, Part 120.12.

Footnote #12, page 10 - As examples again, we include the Low Acid Canned Foods Regulation, 21 CFR Part 113

Page 13, Section titles "Other Part 11 Controls..." - For systems validation, we want to add *Guide to Inspections of Computerized Systems in the Food Processing Industry*.

Sincerely,

WASHINGTON, DC
DUBLIN, CA
SEATTLE, WA

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