THE SCOTCH WHISKY ASSOCIATION

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11 May 2004

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Rm 1061
Rockville
MD 20852
UNITED STATES OF AMERICA

Dear Sirs,

Joint FDA-CBP Plan for Increasing Integration and Assessing the Coordination of PN Timeframes – Docket No 2002N-0278

The Scotch Whisky Association welcomes the FDA and Customs and Border Protection (CBP) announcement of the availability of the above plan and the opportunity to comment on it. It is noted that, in order for comments to be considered as part of FDA's rulemaking concerning the PN of imported food, comments must be submitted on the Joint Plan with the above Docket reference by 14 May 2004.

In view of the significant implications of the Joint Plan in regard to key issues of documentary harmonisation and simplification, the Association believes that interested parties will require more time in which to consider the very important timeframe aspects of the Prior Notice regulations and respectfully asks whether the FDA would consider extending the comment period for a further term.

It is also relevant that, on 14 April, FDA published two other Notices requesting comments relating to particular aspects of the Bioterrorism legislation, all of which it requires by 14 May. The Association believes that it is not realistic to expect that proper consideration can be given and considered responses provided on these three particular comment requests by this deadline.

Accordingly, the Association would be grateful if the FDA would agree to its request for an extension of the comment period.

Yours faithfully,

C.H. McKerrow

C H McKerrow (Miss)
International Affairs Department

2002N-0278

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