



INSTITUTE OF FOOD TECHNOLOGISTS

THE SOCIETY FOR FOOD SCIENCE AND TECHNOLOGY

BARBARA BYRD KEENAN, CAE / *Executive Vice President*

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January 30, 2008

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

Re: Docket 2007N-0489

Dear Sir or Madame:

The Institute of Food Technologists (IFT) appreciates the opportunity to offer comments to the Food and Drug Administration (FDA) on the Report of the Subcommittee on Science and Technology (S&T Subcommittee). IFT is the international, not-for-profit society for food science and technology, with 22,000 members working throughout the profession in academia, industry, and government. IFT exists to advance the science of food; our vision is a safe and abundant food supply contributing to healthier people everywhere. IFT agrees with the S&T Subcommittee's major conclusion that the FDA is not adequately positioned to meet its regulatory responsibilities because increasing demands outpace inadequate resources to ultimately protect the consuming public. It is imperative that substantial resources be made available to the agency to restore its scientific capability and capacity, enabling it to fulfill its mission and, in particular, the Center for Food Safety and Applied Nutrition (CFSAN) and Center for Veterinary Medicine (CVM) to effectively meet regulatory responsibilities.

Given the challenges associated with globalization of the food supply, current and emerging food safety issues, importance of food defense, and the increasingly significant connection between food and health, it is crucial that the FDA's resource deficiencies be corrected. IFT agrees with the S&T Subcommittee's recommendations that CFSAN's and CVM's science base and related inspection and enforcement functions be rebuilt to a level commensurate with regulatory responsibilities. We also agree that not only is updating of internal expertise necessary, but leveraging the expertise and research programs of external partners through extramural collaboration is also needed to ensure that the FDA's scientific needs are met. IFT remains available to provide scientific and technical expertise and assistance to FDA as desired.

To enhance food safety and quality in the future, FDA also requires new funding to be ready for the next generation of challenges. Nanoscale science, engineering, and technology are examples of emerging areas that have great potential to impact the food industry. To fulfill its mission, the FDA must be able to adequately address the potential health benefits and safety issues of emerging technologies and scientific advances and engage in cutting-edge research.

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IFT comments on Docket 2007N-0489

A strong science base, including food science, is critical to effective communication and decision making amongst domestic and international constituencies. IFT stands ready to help ensure that food science is adequately incorporated into current and future FDA efforts. Additional resources must be made available to the FDA to enable it to provide the necessary oversight and regulation of the food system.

Sincerely,

A handwritten signature in black ink that reads "John D. Floros". The signature is written in a cursive style with a large initial "J".

John D. Floros, Ph.D.
President