

EUROPEAN STARCH ASSOCIATIONS

AAC - ASSOCIATION DES AMIDONNERIES DE CÉRÉALES DE L'UE
UFE - UNION DES FÉCULERIES DE POMMES DE TERRE DE L'UE

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

Brussels, 4 April 2003

RE : Regulations on "Registration of food facilities" (Section 305-Docket N° 02N-0276) and on "Prior notice of imported food shipments" (Section 307-Docket N° 02N-0278)

The European starch industry (AAC/UFE) would like to seize the opportunity given to all exporters to the US to send you comments and questions regarding the two regulations that will be implemented as from 12 December 2003 : "Registration of food facilities" and on "Prior notice of imported food shipments".

The AAC/UFE supports all the comments and remarks made by the Confederation of the EU Food and Drink Industries (CIAA) regarding these two regulations and therefore decided to complement them with the enclosed additional comments and questions.

The main issue for our industry is to find a solution regarding products that can be used in both food/feed and non-food/feed applications. It is highly important to avoid that when products are exported for non-food/feed applications, these are submitted to the provisions set in these two regulations.

In addition, we would like to underline that a good exchange of information between US Customs and the FDA is necessary. In fact, the regulation on prior notification requests most of the data that are already provided to Customs, which will only be technically in a position to share this data with the FDA in 2005. Therefore, in the meantime, operators will have to supply twice almost the same information, which is costly for the industry.

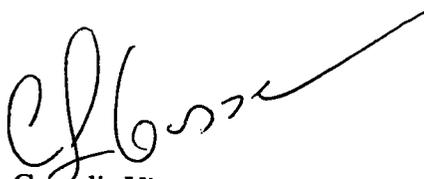
As you can notice from the CIAA comments and the enclosed remarks, we are concerned by these new import measures, as we do believe that these represent a serious additional administrative workload and cost for European exporters to the US, which makes them additional non-tariff barriers to our exports.

Thank you in advance for taking our concerns into account.

Yours sincerely,



Iliana Axiotiades
Managing Director AAC



Cornelis Visser
Secretary General UFE