



Chocolate Manufacturers Association
National Confectioners Association

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May 31, 2005

VIA ELECTRONIC AND FIRST CLASS MAIL

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

RE: REQUEST FOR EXTENSION OF COMMENT PERIODS

Docket No. 2004N-0463 Food Labeling; Prominence of calories

Docket No. ~~2004N-0466~~ Food Labeling: Serving sizes of Products that can reasonably be consumed at one eating occasion; updating of reference amounts customarily consumed; approaches for recommending smaller portion sizes

Dear Sir or Madam:

The National Confectioners Association (NCA) and the Chocolate Manufacturers Association (CMA) request an extension of the comment periods for the two advance notices of proposed rulemaking referenced above. We request an extension for an additional 60 days to August 20, 2005.

NCA and CMS believe that the original comment period does not allow sufficient time for industry and other stakeholders to thoroughly analyze and develop positions concerning the many complex issues presented by these rulemakings. These ANPRs request comments on fundamental changes to the nutrition label. For example, FDA requests comments on whether the serving size declared in Nutrition Facts should continue to be based on consumption data. FDA appears to be reconsidering the whole concept of serving size. The food industry needs more time to consider such fundamental changes.

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FDA also requests comments on possible changes to the reference amounts customarily consumed (RACCs) and to the way in which the RACCs are used to determine a product's serving size. Changes to the RACCs must be considered in light of the recommended serving sizes in the new Food Pyramid recently released by the U.S. Department of Agriculture, as well anticipated changes to the Daily Reference Values and Reference Daily Intakes.

In addition, many of the questions posed by the ANPRs request consumer research data, which takes time to collect and analyze.

CMA and NCA respectfully request that the comment period be extended for an additional 60 days. We appreciate your consideration of this request.

Sincerely,



Lawrence T. Graham
President
National Confectioners Association



Lynn Bragg
President
Chocolate Manufacturers Association