



March 10, 2006

VIA ELECTRONIC MAIL

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

Re: *Docket Number 2005D-0481; Draft Guidance for Industry: Lead in Candy Likely to Consumed Frequently by Small Children: Recommended Maximum Level and Enforcement Policy; Draft Supporting Document: Supporting Document for Recommended Maximum Level for Lead in Candy Likely To Be Consumed Frequently by Small Children; Availability*

These comments are submitted by the Chocolate Manufacturers Association (CMA), in response to the above – referenced draft guidance published on December 27, 2005, by the Food and Drug Administration (FDA).

CMA is the not-for-profit trade association representing the majority of chocolate manufacturers in the United States. In addition to manufacturing a wide variety of finished chocolate and chocolate-containing products for the consumer market, CMA members also supply the trade with bulk chocolate products.

CMA supports the Agency's policy of reducing lead levels in the food supply to the extent technically feasible, and, consistent with current practice, CMA members remain committed to manufacturing practices that minimize consumer exposure to lead.

CMA believes that these manufacturing practices are the intended emphasis in the Chocolate Candy section of the Supporting Document, as these take into consideration the following variables: (a) the naturally occurring levels of lead in cocoa ingredients (including cocoa powders, cocoa liquor, and cocoa butter), (b) the varying quantity of cocoa ingredients used in chocolate products, and (c) the nature of manufacturing processes utilized at both the ingredient and finished product levels. We maintain that

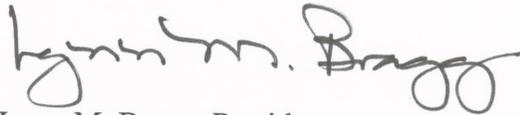
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the manufacturing practices, including sourcing, utilized by our members and their ingredient suppliers are appropriate with respect to lead minimization and protective of human health.

We are hopeful that the final Agency guidance will be issued expeditiously as proposed and thank you for this opportunity to comment.

Feel free to contact Dr. Leah Porter of my staff if you have any questions.

Sincerely, yours,

A handwritten signature in black ink that reads "Lynn M. Bragg". The signature is written in a cursive style with a large, stylized initial "L".

Lynn M. Bragg, President
Chocolate Manufacturers Association