



Consumer Healthcare
Products Association

August 9, 2004

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

Re: Docket No. 1998N-0359: Program Priorities in the Center for Food Safety and Applied Nutrition; Request for Comment (69 Fed. Reg. 35380-35381)

Dear Sir or Madam:

The Consumer Healthcare Products Association (CHPA) is pleased to provide comments regarding Program Priorities in the Center for Food Safety and Applied Nutrition; Request for Comment, 69 Fed. Reg. 35380-35381 (24 June 2004). CHPA, founded in 1881, is a national trade association representing manufacturers and distributors of dietary supplements and over-the-counter drug products. CHPA supports the Agency's efforts to facilitate transparency and foster input in the development of its priorities.

The Agency requested comments on new program areas or activities that CFSAN should add as high priorities, and on other broad program areas that should continue to be a priority for FY 2005. CHPA requests CFSAN to commit to the finalization of Good Manufacturing Practices (GMPs) for dietary supplements as one of its highest priorities for FY 2005. We have long advocated GMPs for dietary supplements and strongly support that priority be given to the promulgation of a final rule by the end of 2004 because of its importance to the industry and to the consumers of dietary supplement products. We believe that effective GMP regulations are consistent with industry's objectives of providing quality products through quality systems and quality assurance. In addition, finalization of GMP regulations will address, to a large part, the question posed by the Agency in the notice for comment: "Where do we do the most good for consumers?"

CHPA looks forward to continued cooperation with the Agency as plans are made to finalize GMPs for dietary supplements and welcomes the opportunity to work with the Agency and other interested parties towards that end.

Respectfully submitted,

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Vice President, Regulatory and Scientific Affairs