



Calorie Control Council

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SEP 13 2000
10:11 AM '00

VIA FACSIMILE 202-205-0165

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September 5, 2000

Dr. Charles W. Copper
Office of Constituent Operations
HFS-585
CFSAN
Food and Drug Administration
200 C Street SW
Washington, DC 20204

00-041N
00-041N-2
Lyn O'Brien Nabors

**Re: Calorie Control Council --Proposed Draft Standard for
Chocolate and Chocolate Products**

Dear Dr. Cooper:

The Calorie Control Council ("the Council") provides the following comments on the Codex Committee on Cocoa Products and Chocolate's Proposed Draft Standard for Chocolate and Chocolate Products. The Council is an international association of manufacturers of low-calorie and reduced-fat foods and beverages, including the manufacturers and users of a variety of alternative sweeteners, fat replacers and low-calorie bulking agents.

The Council supports Codex efforts to allow for more flexibility in standards for chocolate products that will benefit consumers by allowing for a broader range of desirable chocolate products to be produced and/or marketed.

The Council is especially encouraged by the Codex Committee on Cocoa Products and Chocolate's proposal to allow the use of alternative sweeteners in addition to sugars in chocolate products. This will allow for the production of lower fat, lower calorie chocolates--possibly with no sugar added-- which many consumers are now interested in purchasing. Alitame and sucralose should, however, be added to the list of sweeteners under 3.4.

In 1997, the Joint Expert Committee on Food Additives (JECFA) reviewed and allocated alitame an acceptable daily intake of 0-1 mg per kg of body weight and alitame is listed in the Codex General Standard for Food Additives (GSFA) for a number of use categories, including confectionery.

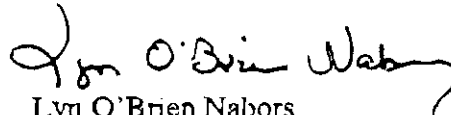
Sucralose is approved by the U.S. Food and Drug Administration as a "sweetener in food, generally in accordance with current good manufacturing practice in an amount not to exceed that reasonably required to accomplish the intended effect." In 1991, JECFA reviewed and allocated sucralose an acceptable daily intake of 0-15 mg/kg of body weight and sucralose is listed in the GSFA for a number of use categories, including chocolate products.

The Calorie Control Council, therefore, requests that the U.S. delegation recommend that the following information on alitame and sucralose be added to **3.4 SWEETENERS**:

INS#		Maximum Level	Products
956	Alitame	300 mg/kg	Products described under 2.1 to 2.4
955	Sucralose	800 mg/kg	Products described under 2.1 to 2.4

The Council appreciates the opportunity to submit these comments and urges the U.S. delegation to recommend the changes requested by the Calorie Control Council. Should you have any questions or need additional information, please feel free to contact us.

Respectfully submitted,


Lyn O'Brien Nabors
Executive Vice President

LON/db