

National  
Seasoning  
Manufacturers

Association, Inc. '01 OCT 29 P2:49

October 29, 2001

Docket No. OOP-1322

President

Tom Haney  
Flavorite Div.  
Newly Weds Foods

Dockets Management Branch [HFA-305]  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Gentlemen:

Vice President

Peter Shah  
Spice Tec USF

The Association appreciates the opportunity to comment on the Federal Register Proposed Rule Announcement of the Public Meeting [Federal Register/Vol.66, No. 143, July 25, 2001. The meeting, **Food Safety and Food Labeling; Presence and Labeling of Allergens in Foods** was held August 13, 2001.

Secretary

Lynn Theiss  
Newly Weds Foods

The National Seasoning Manufacturers Association, founded in 1972, has 28 members who either prepare mixtures of spices and other seasoning ingredients used by food processors, or are suppliers of ingredients or services to seasoning blenders. Many seasoning blends made by our members contain one or more food ingredients of the eight foods that are most frequently implicated in serious allergenic responses.

Treasurer/Executive

Director  
Dick Alsmeyer, PhD

The Association believes that mandatory rulemaking is needed to require all food labels identify the eight foods identified as food allergens. Specific issues of concern are:

Directors

Jim Purvis  
A.C. Legg  
Jerry Hall  
Excalibur Seas.  
Roger Maehler, PhD  
Heller Seas. Ingr.  
Simon Statter  
Presco Food Prod.  
Barry Eddy  
Spice Tec USF

- Labeling should be in *common English names* in the ingredients listing of labels.
- *Advisory labeling* should be used sparingly and only when good manufacturing practices fail to prevent presence of food allergens. Criteria by the Food Allergy Issues Alliance is a reasonable requirement for use of advisory labeling.
- *Labeling of Ingredients Exempted from Declaration [common or usual names of flavorings, spices, and colors; incidental additives]* the Association supports FDA's position that the above ingredients should list on the product label the common or usual name of individual flavoring, spice or color of any ingredients that are among the eight most common food allergens.
- As only the smallest amount of a food allergen may cause allergic reactions among consumers, it is necessary that any incidental additives that are food allergens be listed on the label.

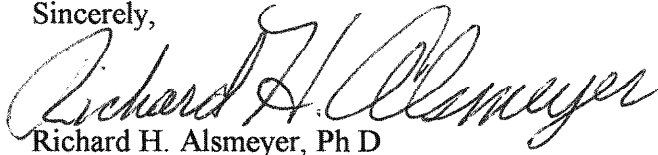
We support the continued exemption from label declaration of ingredients used for a technical effect or processing aid if they are not among the eight common food allergens.

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The Association strongly supports the will of the Congress as expressed in the FD&C Act, that flavorings, spices, and colors not be identified separately, but be grouped by the above categories for proprietary privacy purposes.

Sincerely,

A handwritten signature in black ink, reading "Richard H. Alsmeyer". The signature is written in a cursive style with a large, prominent initial "R".

Richard H. Alsmeyer, Ph D  
Executive Director

**National  
Seasoning  
Manufacturers  
Association, Inc.**

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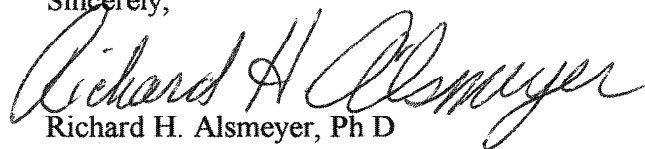
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Richard H. Alsmeyer, Ph D  
Executive Director