✟ **CENTRAL SOYA**

September 14, 2001

Dockets Management Branch (HFA-305)
Food and Drug Administration,
5630 Fishers Lane, rm. 1061,
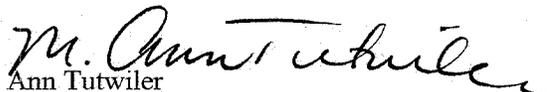Rockville, MD 20852

Re: CFSAN Priorities, FY 2002

Central Soya Company, Inc. would like to offer our comments on the Center for Food Safety and Nutrition's priorities for fiscal FY 2002. In FY 2001, Central Soya and the National Food Processors Association approached the agency to discuss the possibility of establishing a policy that would automatically allow a nutrient content claims for foods with an FDA approved health claim. Foods which have been approved for an FDA health claim, such as soy protein, but contain less than the RACC amount, could make a nutrient content claim (good source, excellent source) on their labels. In this way, consumers would be able to identify foods that can help them meet the daily level of consumption needed to achieve the a desired health effect from a particular food ingredient.

In several discussions with FDA policymakers and attorneys, the support for this approach has been quite strong. In fact, in 2001, this issue was placed on the "B" list. During the year, the agency has made terrific progress in drafting a text for this proposal. It would take very little in the way of additional agency time and resources to publish this policy in the Federal Register. This proposal is also consistent with one of the key issue areas, beyond food safety mentioned prominently in the Federal Register notice: nutrition, health claims and labeling.

We therefore urge the agency to move this issue to it's "A" list of issues to be completed in the next fiscal year.

Sincerely,

Ann Tutwiler
Ann Tutwiler
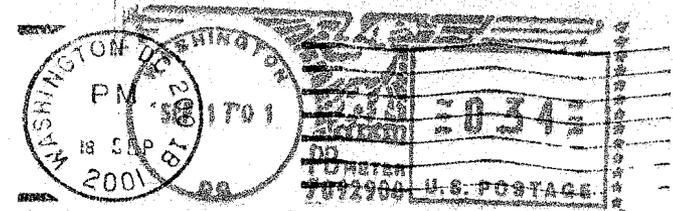Director
Governmental Affairs

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