



# Food & Beverage

## ISSUE ALLIANCE

March 23, 2020

RE: Request For 120 Day Extensions for FDA Regulations, Guidance Documents, and Federal Register Notices with Open Comment Periods

Dear Deputy Commissioner Yiannas and Dr. Mayne:

The undersigned trade associations always appreciate the opportunity to provide comments on U.S. Food and Drug Administration's (FDA or agency) proposed regulations, guidance documents, and other initiatives announced through *Federal Register* Notices (FRNs). Each association strives to provide substantive comments when given the opportunity so that final versions of these policies, guidance and other initiatives consider stakeholder perspective and are fit for purpose. The open policy development process provides a mechanism for meaningful stakeholder engagement and is vital for the development of effective policies, programs and regulations.

At present, there are several FDA draft regulations, guidance documents, and FRNs that pertain to the food industry with open comment periods. For example, the proposed Laboratory Accreditation rule, the latest draft components of the Intentional Adulteration guidance, the FRN requesting comments on the proposed food standard of identity guidelines are all presently open for comment, among others.

As you are aware, the food industry and its supply chain are classified by DHS-CISA as a Tier 1 Type of Essential Critical Infrastructure Workforce and must remain fully operational so as to continue to feed the country as the nation responds to the COVID-19 pandemic. The undersigned trade associations represent businesses that span the full scope of the food production and distribution supply chain. We are presently focusing all of our efforts on addressing the massive challenges presented by the pandemic.

Our collective request is for FDA, to extend for at least 120 days, all open comment periods for food related proposed FDA regulations, draft guidance documents and FRNs to allow the food industry to focus its efforts on COVID-19 response efforts and assuring that food production continues without pause. This proposed action will allow stakeholders to continue to provide thoughtful and meaningful input into federal government actions that directly affect the food industry.

We thank you in advance for your consideration of this request.

Most respectfully,

American Bakers Association  
American Frozen Food Institute

American Herbal Products Association  
American Spice Trade Association  
Consumer Brands Association  
Corn Refiners Association  
Council for Responsible Nutrition  
Enzyme Technical Association  
Flavor & Extract Manufacturers Association  
FMI – The Food Industry Association  
Independent Bakers Association  
International Dairy Foods Association  
International Food Additives Council  
Juice Products Association  
National Association of Chemical Distributors  
National Confectioners Association  
National Fisheries Institute  
North American Millers' Association  
Peanut and Tree Nut Processors Association  
SNAC International  
The Association for Dressings & Sauces  
The Sugar Association  
United Fresh Produce Association  
Vinegar Institute