

FEB 13 1968

TELEPHONE HUDSON 3-6126

Manufacturing Chemists' Association, Inc.

(FOUNDED 1872)

1825 CONNECTICUT AVENUE, N. W.
WASHINGTON, D. C. 20009

February 12, 1968

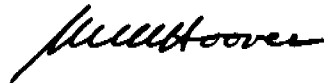
TO: Members of the Food, Drug, and Cosmetic Chemicals
Committee

SUBJECT: MCA Statement re Proposed Good Manufacturing
Practice Regulations

Gentlemen:

Enclosed is a copy of the MCA statement sent to
HEW February 9.

Sincerely yours,



Morgan M. Hoover

MMH:sjg

Enclosure

ASI 00002032

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WASHINGTON, D. C. 20009

GEORGE H. DECKER
General U.S.A. (Ret.)
PRESIDENT

February 9, 1968

Hearing Clerk
Department of Health, Education,
and Welfare
Room 5440
330 Independence Avenue, S. W.
Washington, D. C. 20201

Dear Sir:

The Manufacturing Chemists Association submits the following comments with respect to the proposed regulations covering "Current Good Manufacturing Practice (Sanitation) in Manufacture, Processing, Packing, or Holding" of human foods as published in the Federal Register of December 15, 1967. The Manufacturing Chemists Association is a nonprofit trade association of 184 United States and 14 Canadian company members representing more than 90 percent of the production capacity of basic industrial chemicals within these countries.

As presently drawn, the proposed regulations purport to apply to the manufacture of "food" as that term is defined in Section 201 (f) of the federal Food, Drug, and Cosmetic Act. The definition includes chemicals which are used as components of foods.

On behalf of those members of the Manufacturing Chemists Association which manufacture food additives, color additives, and other chemicals used in foods, we strongly urge the addition of a statement in the proposed regulations which says that food chemical plants, and the manufacture of food additives, color additives, and other chemicals used in food, are completely excluded from the coverage of these regulations. We believe that this exclusion was intended by the Food and Drug Administration, and that this addition should be incorporated so as to avoid misunderstanding and confusion.

Sincerely,



G. H. Decker