



Consumer Healthcare
Products Association

August 9, 2004

Barbara O. Schneeman, Ph.D.
Director, Office of Nutritional Products,
Labeling, and Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Dear Dr. Schneeman:

Thank you for your July 22, 2004, letter and the opportunity to comment on the U.S. Government position in preparation for the November 2004 meeting of the Codex Committee on Nutrition and Foods for Special Dietary Uses. The Consumer Healthcare Products Association is the 123-year-old trade association representing manufacturers of dietary supplements and nonprescription, or over-the-counter medicines. CHPA members manufacture and distribute dietary supplements both in the U.S. and other countries around the world, and therefore have an interest in the CCNFSDU proposed draft guidelines for vitamin and mineral food supplements, and the CCNFSDU proposed draft recommendations on the scientific basis of health claims.

We would like to commend the U.S. Government position previously taken on the vitamin and mineral supplement draft guidelines, and encourage the U.S. Government to maintain a similar position. The U.S. Government's leadership has been key in getting the draft guidelines to step 5, and will continue to be key in seeing them through the remainder of the Codex process. It is critical that the draft guidelines continue to appropriately stress that any maximum levels of vitamins and minerals should be based on safety assessments and not arbitrary application of a percentage of recommended daily intake. Similarly, the draft guidelines should continue to reflect the importance of consumer choice and access to safe vitamin and mineral supplements that are labeled in a truthful and non-misleading manner.

We appreciate the opportunity to submit these comments, and thank you for considering our views.

Sincerely,

/s/

David C. Spangler
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