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April 23, 2020

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

Re: Docket No. FDA—1995—N—0062 (Formerly 1995N—0294) for “General Principles and Food Standards Modernization; Reopening of the Comment Period”

Submitted via: <https://www.regulations.gov>

Dear Dockets Management Staff:

The Institute of Food Technologists (IFT) appreciates the opportunity to provide the Food and Drug Administration (FDA) with comment during the reopened comment period for the proposed rule published on May 20, 2005 entitled “Food Standards; General Principles and Food Standards Modernization.” This comment follows our more extensive comments submitted to the Agency on October 11, 2018 to Docket No. FDA—2018—N—2381; “The Food and Drug Administration’s Comprehensive, Multi-Year Nutrition Innovation Strategy; Request for Comments,” which we are attaching for your convenience.

IFT is a global organization of nearly 16,000 individual members in more than 100 countries, who are committed to advancing the science of food. Since 1939, IFT has brought together the brightest minds in food science, technology and related professions from academia, government, and industry to solve the world’s greatest food challenges. Our organization works to ensure that our members have the resources they need to learn, grow, and advance the science of food as the population and the world evolve. We believe that science is essential to ensuring a global food supply that is sustainable, safe, nutritious, and accessible to all.

IFT is supportive of the continuation of Standards of Identity; however, we are interested in a more flexible approach that encourages development and application of innovative or alternative food ingredients and manufacturing processing technologies. For example, use of salt substitutes and alternative sweeteners could assist with salt and sugar reduction, respectively. Such changes need to be based on sound science, ensure food safety, and maintain the essential characteristics of the food such as nutritive value and sensory qualities. To avoid any potential unaddressed unintended consequences, use of innovative ingredients, ingredient substitutions, and process innovations should be supported by thorough safety and efficacy assessments and an understanding of consumer behavior.

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Flexibility is important to allow for technological advancements and innovative means to meet evolving consumer needs for a safe, nutritious, convenient, and affordable food supply that is accessible to all. Also, IFT supports harmonization of U.S. standards with international standards to the extent feasible.

Thank you for considering our comment on this important activity. If IFT may provide further information or assistance, please contact either Farida Mohamedshah, Director, Nutrition Science, Food Laws & Regulations ([fmohamedshah@ift.org](mailto:fmohamedshah@ift.org); 202-330-4986), or Rosetta Newsome, Ph.D., Director, Science, Policy, & Scientific & Regulatory Affairs ([rlnewsome@ift.org](mailto:rlnewsome@ift.org); 312-369-0575).

Sincerely,



Pam Coleman, MBA, CFS  
IFT President, 2019-2020



Christie Tarantino-Dean, FASAE, CAE  
Chief Executive Officer