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

RE: Docket (FDA-2024-N-1809) Listening Session: Optimizing FDA's Use of and Process for Advisory Committees

The undersigned members of the Food and Beverage Issue Alliance (FBIA) appreciate the opportunity to provide comments to the Food and Drug Administration (FDA or Agency) regarding Listening Session: Optimizing FDA's Use of and Process for Advisory Committees, Docket FDA-2024-1809. FBIA is a coalition of over 45 allied U.S.-based food and beverage trade associations representing various parts of the supply chain, from farmers and agricultural processors, to packaged goods and retail.

We appreciate the FDA's efforts to ensure that advisory committees provide independent advice on scientific, technical, and policy matters to support the Agency's goal to protect and promote public health. To ensure policy decisions are well informed in a manner that appropriately considers the multidisciplinary aspects of food safety and nutrition to protect public health, it is critical that FDA reinstate its Food Advisory Committee (FAC or Committee).

The FAC provided invaluable insights and guidance on many food-related issues, drawing upon the expertise of subject matter experts (SMEs) across various disciplines. For example, FDA convened the FAC to consider the available relevant data on consumption of synthetic color additives in food and adverse effects on behavior¹, policies related to the presence of *Listeria monocytogenes* in ready-to-eat foods², and detection of chemical hazards in foods³, among others. The reinstatement of the FAC would ensure that the FDA continues to benefit from the comprehensive, specialized knowledge necessary for informed decision making.

To maximize the effectiveness of the FAC, we propose that the Committee change the SMEs who serve based on the specific food-related issue under consideration. This flexible approach would ensure that the FDA benefits from the most relevant and specialized knowledge for each topic. For example, when evaluating the safety and efficacy of food additives, it is imperative to include experts who specialize in toxicology and chemical safety. When addressing issues related to foodborne pathogens, food scientists, microbiologists, and/or epidemiologists, with expertise in infection control should be consulted. Nutrition experts can address concerns related to diet and nutrition, including obesity, diabetes, and other diet-related conditions. This targeted selection of SMEs would enhance the quality of the committee's recommendations and ensure that all relevant aspects are thoroughly examined.

¹ FDA [Food Advisory Committee Meeting](#). March 30-31, 2011.

² FDA [Food Advisory Committee Meeting](#). December 7-8, 2015.

³ FDA [Food Advisory Committee Meeting](#). December 7-8, 2015

FDA Advisory Committees, including the FAC, serve as a transparent platform for public engagement, fostering trust and confidence in the Agency's regulatory processes. By consulting a diverse panel of experts tailored to specific issues, the FDA can ensure that a wide range of perspectives and scientific evidence are considered, enhancing the credibility and acceptance of FDA decisions. We urge the FDA to re-establish the FAC with a flexible, expertise-driven approach, thereby reaffirming its dedication to evidence-based regulation.

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We appreciate the opportunity to submit these comments and the FDA's engagement with industry regarding critical food safety and nutrition matters. We look forward to continued engagement on this issue. Please do not hesitate to contact our organizations with any questions you may have regarding these comments.

Sincerely,

Alliance for Chemical Distribution
American Bakers Association
American Frozen Food Institute
American Spice Trade Association
Association for Dressings and Sauces
International Dairy Foods Association
International Food Additives Council
Juice Products Association
National Confectioners Association
National Pasta Association
National Seasoning Manufacturers Association
Refrigerated Foods Association