founded 1881

March 14, 2007

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket No. 2004P-0464: Proposed Rule on Food Labeling: Health Claims; Calcium and Osteoporosis, and Calcium, Vitamin D, and Osteoporosis; 72 *Fed. Reg*. 497 (January 5, 2007)

Dear Sir or Madam:

On January 5, 2007, the Food and Drug Administration (FDA) issued a proposed rule on food labeling for health claims regarding calcium and osteoporosis, and calcium, vitamin D, and osteoporosis (72 *Fed. Reg*. 497). A related notice was also published in this issue of the *Federal Register* (*Fed. Reg.*) withdrawing certain proposed amendments to a proposed rule published on December 21, 1995, for calcium and osteoporosis health claims (Docket Nos. 1994P-0390 and 1995P-0241; 72 *Fed. Reg*. 519; January 5, 2007). The Consumer Healthcare Products Association (CHPA) welcomes the opportunity to comment on the proposed rule changes. Founded in 1881, CHPA is a national trade association representing manufacturers and distributors of dietary supplements and over-the-counter drug products.

CHPA Dietary Supplements Committee (DSC) members fully support the proposed changes to the labeling requirements for health claims regarding calcium and osteoporosis. These proposed changes, as outlined in the *Fed. Reg*. notice, amend the regulation authorizing health claims on the relationship between calcium and a reduced risk of osteoporosis. We believe these revisions will have a positive impact on public health and encourage the Agency to issue the final rule for these changes as soon as possible.

CHPA DSC members thank the FDA for the opportunity to record our agreement with the Agency's proposed rule changes and our recommendation to finalize these changes in an expedited manner. Please feel free to contact me if necessary.

Sincerely,

Marcia D. Howard

Marcia D. Howard, Ph.D.
Associate Director of Scientific Affairs

Consumer Healthcare Products Association
900 19th Street, NW, Suite 700
Washington, DC 20006
T 202.429.9260 F 202.223.6835
www.chpa-info.org