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**February 26, 2015**

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

Re: Request for Comments on 1,4-Butanediol; FDA Docket No. FDA-2015-N-0045

To Whom It May Concern:

The American Apparel & Footwear Association (AAFA) is submitting these comments in opposition to the World Health Organization's (WHO) proposal to list 1,4-Butanediol (BDO) under Schedule I of the 1971 United Nations Convention on Psychotropic Substances (1971 Convention).

Representing more than 1,000 world famous name brands, the American Apparel & Footwear Association (AAFA) is the trusted public policy and political voice of the apparel and footwear industry, its management and shareholders, its four million U.S. workers, and its contribution of \$361 billion in annual U.S. retail sales.

We urge the United States to oppose this proposal during the March 2015 meeting of the United Nations Commission on Narcotic Drugs (CND) in Vienna, Austria.

- BDO has widespread industrial applications, including as an input used in the global production of spandex fibers.
  - Spandex fibers, which provide a unique stretch recovery quality, are an important and safe component in an extensive and growing range of textile and apparel products.
- Placing BDO under Schedule I of the 1971 Convention would impose significant regulatory restrictions and costs on the legitimate use of this valuable and widely used input.

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- Such burdens would create uncertainty about the use of spandex fibers and consumer products that contain spandex.

Should you need additional information, please contact Marie D'Avignon at [mdavignon@wewear.org](mailto:mdavignon@wewear.org) or 703-797-9038.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Lamar". The signature is fluid and cursive, with the first name "Stephen" and last name "Lamar" clearly distinguishable.

Stephen Lamar  
Executive Vice President