

April 15,2001

Dr. Sharon Benz, Leader Nutrition & Labeling Team FDA - GVM  
Center for Veterinary Medicine  
7500 Standish Place, HFV-228  
Rockville, Maryland 20855

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Dr. John Breitsman, Feed Program Specialist  
Pennsylvania Department of Agriculture, Bureau of Plant Industry  
2301 N. Cameron Street  
Harrisburg, PA 17110-9408

Dear Dr. Benz, Dr. Breitsman and Washington state AAFCO representatives:

I am a breeder of Arabian horses and an owner of pet dogs and cats. As such I am extremely concerned about removal from sale of supplements designed for animals. I am not aware of such a number of side effects that this drastic action should be necessary.

I want supplements that are designed by veterinarians or qualified companies knowledgeable in animal nutrition, and that are appropriate in dose and chemistry for my particular animals.

If these supplements are made illegal, research on supplements for companion animals will be stifled, and we want research done on these helpful but non-patentable substances. People will be left with no choice but to reach for human supplements which are not formulated for animals and left to completely guess at what course of action may be best for the pet they dearly love.

Consider that:

\_People can consume herbals and nutraceuticals (MSM, glucosamine, etc.) but they are "illegal" to feed to horses because a small percentage of horses go for human food.

\_There are an estimated 6.9 million horses in this country. It is an industry that involves \$25.3 billion a year.

\_In 1999 approximately 70,000 US horses were slaughtered for food. This means the other 99% of the US horse population may be prevented from benefiting from the supplements of the owner's choice.

\_The concern over the trace amounts of herbs and nutraceuticals in the horses that go for food is totally unfounded, as these same substances are approved for human consumption here and abroad in their undiluted form.

\_Laws permit the feeding of prescription drugs and OTC organophosphate pesticides and toxic wormers, with no label restrictions other than "not for use in horses intended for food".

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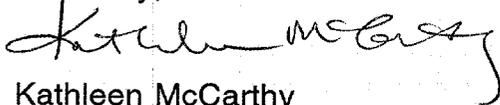
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\_The median income for horse-owning families is \$60,000 compared to \$36,000 for all households. Horse owners are an influential segment of the voting public. And believe me, my husband and I vote in each and every election.

Removal of animal supplements from sale will not solve the problem; indeed, it will significantly worsen the situation. Please, let's avoid a New "Prohibition" of substances that we have used safely and successfully for many years.

Thank you for your time and attention.

Sincerely,



Kathleen McCarthy  
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cc: Ali Kashani, Feed and Fertilizer Program Administrator  
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