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*Rec'd 12/7/99*

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**To:** Docket No. 99D-2638 c/o Ms. Judy Gushee, FDA, CVM      **Date:** November 23, 1999

**Fax #:** 301-827-1498      **Pages:** 3, including this cover sheet.

**From:** Elizabeth Curry-Galvin, DVM

**Subject:** ELU of Med. Feeds for Minor Species

## COMMENTS:

Please place the attached AVMA comments on Docket No. 99D-2638, "Use of Medicated Feeds for Minor Species; Draft Compliance Policy Guide; Availability."

*99D-2638*

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November 23, 1999

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, room 1061  
Rockville, MD 20852

Re: Use of Medicated Feeds for Minor Species: Draft Compliance Policy Guide: Availability  
(Docket No. 99D-2638)

Dear Sir or Madam:

The American Veterinary Medical Association, on behalf of its 63,000 members, wishes to comment on the draft Compliance Policy Guide addressing the use of medicated feeds for minor species. The AVMA is the national professional association of veterinarians whose members are charged ethically and legally with the protection of the health of animals within their care, as well as the protection of public health.

The AVMA wishes to respond favorably to the content of the draft Compliance Policy Guide. The welfare of minor species is currently compromised by the lack of approved drugs. There are minor species that experience disease, pain, suffering, and death which can be relieved by the extralabel use of medicated feeds under the supervision of a veterinarian. Some minor species cannot practically be medicated in any way but through the feed, due to their size, numbers, temperament, inaccessibility, or inability to tolerate the stress of handling when sick.

Some species will derive important welfare benefits from this flexibility while other minor species, for example aquatic species, may derive only limited benefit from the flexibility described in the draft CPG, since there are only two drugs approved for use in medicated feeds for aquatic species. Issues related to the nutritional formula and physical make-up of the feed may limit the acceptance and practical use of the medicated feed in several species. Yet, given the paucity of drugs approved for use in minor species, the AVMA welcomes this flexibility as a means to lessen animal illness, suffering and death.

The draft CPG recognizes the role of the veterinarian and the necessity of the veterinarian-client-patient relationship for the proper extralabel use of drugs. Through their medical training and professional experiences, veterinarians possess the knowledge and expertise to establish diagnoses and recommend therapies. The stated regulatory discretion will allow veterinarians to apply their medical judgement to the proper treatment of minor species, in compliance with the CPG.