



THE DIFFERENCE IS NUTRITION 01 NOV 16 09:50

November 15, 2001

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane  
Room 1061  
Rockville, MD 20852  
Docket No. 01 N-0423  
Substances Prohibited From Use in Animal  
Food or Feed Animal Proteins Prohibited  
In Ruminant Feed

To Whom It May Concern:

Nutro Products, Inc. is a pet food manufacturer headquartered in the City of Industry, California. We distribute a broad line of premium pet foods nationally and are one of the top 3 providers of premium pet foods to the pet specialty industry. We appreciate the opportunity to comment on the current rule to help prevent the establishment and amplification of bovine spongiform encephalopathy (BSE) in the U.S.

Nutro believes that the current rule as defined in Title 21, Code of Federal Regulations, Part 589.2000 is adequate and further education and compliance efforts are the most effective way of reducing BSE in the U.S. A continued sustained effort would be far more effective in reducing risk than changes to the current rule. We believe the exemptions in the rule are scientifically justified.

Nutro strongly supports the current cautionary labeling statement on ruminants feeds and does not believe that pet foods other than salvage pet foods, should be labeled with the statement; "Do not feed to cattle or other ruminants". This statement is unnecessary and confusing and would present significant financial risk to the US pet food industry since consumers do not understand the term ruminants. If pet foods bare this statement, consumers will fearfully be inclined to steer away from it.

Nutro believes that more effort should be placed in educating salvage dealers, feed manufacturers, and animal producers regarding the proper disposition of salvage pet foods and gaining compliance though use of measured enforcement rather than remove the exemption for pet foods.

Thank you for the opportunity to submit these comments.

Sincerely,

Sharon Machlik, Ph.D.  
Director Technical Marketing

DktsMng

01N-0423

FDA/ir

Nutro Products, Inc. 445 Wilson Way, City of Industry, California 91744 phone: 626.968.0532 fax: 626.968.3962

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