



SD ANIMAL INDUSTRY BOARD

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October 4, 2001

DOCKETS MANAGEMENT BRANCH
(HFA-305)
FOOD AND DRUG ADMINISTRATION
5630 FISHERS LN RM 1061
ROCKVILLE MD 20852

Sirs:

Ref: Docket N. 01N-0284

Comments:

In writing proposed regulations on import tolerances for imported food products of animal origin, please consider:

- (a) The importing country must be subject to a risk assessment completed by qualified U.S. personnel and found to have safeguards equivalent to the U.S. for:
 - (1) feed additive ingredients usage
 - (2) biologic usage
 - (3) plant pesticide usage
 - (4) any other chemical, physical, or biologic usage
 - (5) extra label usage including specific prohibited drugs identical to U.S.
- (b) Labeling as to the country of origin for valid and effective traceback
- (c) Adequate enforcement for residue violations

If such regulations are not in effect, we place the safety of consumers in serious jeopardy and erode confidence in our food supply.

It seems ironic that in the same FDA publication and on the same date and page, an article appears documenting a jail sentence for a U.S. producer for residue violations adjacent to the article seeking comments on a proposal to finally establish even a "tolerance" for drugs that are unapproved new animal drugs in the U.S. but are used in countries importing meat and animal products to the U.S.

Such drugs should have "zero" tolerance until such time as FDA has approved and established tolerance in the U.S. This means product should not be allowed for import until the above conditions have been met.

Thank you sincerely,


Sam D. Holland, D.V.M.
State Veterinarian and Executive Secretary
South Dakota Animal Industry Board

01N-0284

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ADDRESS SERVICE REQUESTED



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