



ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS, INC.

Washington State Department Of Agriculture  
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Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5600 Fishers Lane, Room. 1061  
Rockville, MD 20852

Docket No. 02D-0468

To Whom It May Concern:

On behalf of the Association of American Feed Control Officials (AAFCO), I wish to comment on the Draft Guidance for Industry on Manufacture and Labeling of Raw Meat Foods for Companion and Captive Non-companion Carnivores and Omnivores. The following comments are provided in response to the Federal Register Notice issued on December 18, 2002 (Volume 67, Number 243, Pages 77500-77501), Docket No. 02D-0468. AAFCO is an international association with membership consisting largely of state feed control officials responsible for administration of state laws, rules, and portions of the Food, Drug and Cosmetic Act pertaining to the distribution of commercial feed, including pet food, and feed ingredients for livestock, poultry and other animals, including pets. All fifty states, Puerto Rico, Canada, Costa Rica, the United States Department of Agriculture, and the Food and Drug Administration (FDA) are members of AAFCO.

While AAFCO members are in agreement and commend the FDA for drafting this document, the association wishes to address the following items:

1. All raw diets for dogs and cats must pass either of the two nutritional adequacy requirements if a complete and balanced claim is made. The above referenced document presents this as a possibility and not a requirement.
2. On page 7 of the document under "other claims", the term "human grade" is stated. AAFCO has gone to great lengths to have this claim removed from pet products. Including this in your document gives a level of credence to it.
3. This document is a guideline and is full of suggestions; however, there is no suggested inspection or enforcement program identified. How can all these claims be verified, particularly after ingredients leave a USDA inspected plant?

AAFCO appreciates your consideration of the above comments and will look forward to your response.

Sincerely,

Ali Kashani, Ph.D.  
AAFCO President

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cc: Dr. William J. Burkholder, CVM, FDA