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August 24, 1997

Dockets Management Branch (HFA-305)
Food and Drug Administration
12420 Parklawn Drive, Room 1-23
Rockville, MD 20857

RE: Request for Comments on Development of Options to Encourage Animal Drug Approvals for Minor Species and Minor Use (Docket No. 97N-0217)

Major changes are needed in the way drugs are evaluated and approved for Minor Species and for Minor Use. I urge the adoption of regulations and procedures that will incorporate the following concepts:

- Not all life stages of aquatic species being produced for food should be regulated in the same manner as the stage of development of aquatic species nearing or completing the stage considered food and ready for processing and consumption. My catfish, for example, are not consumed for food for approximately 2 years after the egg is laid.
- The evaluation of drugs should be based on groupings of species and not limited to approval for use on a single species.
- Aquatic species should be considered merely a substrate for external pathogen.
- Label use should be broad enough to permit a veterinarian to prescribe a use not specifically listed on the label.

In summary, I have reviewed the response prepared by National Aquaculture Association and strongly support their detailed response.

Sincerely,

George Ray

HFA-305

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