

**U.S. Food and Drug Administration, Center for Veterinary Medicine (CVM)
[Docket No. 98N-0339]**

Request for Comments

August 17 1998 '98 SEP 16 110:10

Comments on behalf of the Association of Food and Drug Officials (AFDO)

Joseph Corby, President

The Association of Food and Drug Officials has for over 102 years served federal state and local government officials as a voice to promote uniformity among the regulatory community. In addition, AFDO has worked tirelessly to provide guidance and training to health professionals in the food, drug, medical device, and cosmetic fields. We are pleased to offer comments to the Center for Veterinary Medicine relative to the Food and Drug Administration's (FDA) Modernization Act of 1997 and how FDA can best meet its statutory obligations.

AFDO has previously offered comments to the Center for Food Safety and Applied Nutrition (CFSAN) and the Center for Drug Evaluation and Research (CDER). AFDO has always considered itself a partner to FDA as we share so many common goals and objectives.

AFDO, after receiving comments from its Executive Board members, wishes to identify the following issues that we believe must be priorities for CVM consideration.

1. CVM Must be the Scientific Leader in Matters Relative to Veterinary Medicine

It is critically important to states that timely feedback to requests for assistance and interpretations be provided by CVM. Emerging issues such as antimicrobial resistance from animal drugs must be addressed in a national forum fashion to keep states well advised. Although there may be many initiatives at the state level, it is important that CVM maintain a leadership role on all matters concerning veterinary medicine.

2. CVM Must Strengthen Ties with the States on Issues Involving Bovine Spongiform Encephalopathy (BSE) and Other Food Animal Health Issues

Currently little is heard at the state level other than what is reported in national publications. AFDO asks that CVM provide a network link to the states relative to BSE and animal health surveillance, education, and results of research. This link must integrate CVM with state veterinarians and state food program managers.

3. CVM Needs to Re-engineer the Animal Drug Approval Process

AFDO is pleased to learn of CVM's attempt to hold public meetings on this matter and their attempt on how to best address the approval process.

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4. **CVM Must Strengthen Ties with the States with Respect to Human Prescription Drug Dispensing by Veterinarians**

CVM needs to be very cognizant that state laws vary considerably on this issue and regulatory work needs to be coordinated.

5. **CVM Must Provide Better Guidance with Respect to New Contract or Partnership Proposals**

Whether BSE, tissue residue, or medicated feed, CVM must recognize the importance of these programs to state agencies. AFDO believes the proposals will have to be expanded in order to satisfy federal and state objectives. CVM must utilize the enormous resources available at state and local levels. In addition, adequate training should be provided for all.

6. **CVM Should Promote Partnerships for Inspection and Sampling of Medicated Feeds or High Risk Animal Feed**

In a "farm to table" inspection approach the idea of partnerships between federal and state counterparts is practical and wise. AFDO encourages CVM to meet with state counterparts and explore existing opportunities.

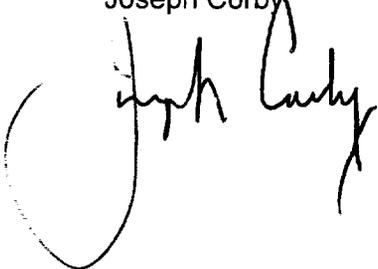
AFDO believes there will be an enormous change to food safety and how food is regulated in the coming years. Clearly, the health of animals must be better recognized. AFDO has been very progressive in promoting its vision of a vertically integrated national food safety system. We call the system Food Safety/VINE (Vertically Integrated National Enterprise). We use the acronym VINE in describing a joint effort of federal, state, and local food safety organizations. There are two key words within the acronym VINE -- vertically and integrated. A vertical system is one which functions from top to bottom with the federal government providing leadership through technical support, setting of standards, risk assessment, program evaluation, certification of field personnel, training, and additional funding to the states or local agencies. CVM is viewed as the leader in veterinary matters, including animal health and it is an important element in this vision. The role of state and local governments is to employ their army of inspection personnel and laboratory services to perform domestic inspections, investigations, and sample collections. Simply put, we believe the success of cooperative agreements, cooperative programs, and partnerships should be taken to a national level. We believe this country needs one food safety system and that it not belong to the federal government or any particular state, but rather an integrated national food safety system with all stakeholders playing a major role. The integrated function of Food Safety/VINE is not solely a human resource issue but also an information resource. A national database employed and implemented to include all state and federal food and animal feed product analysis would be very valuable and useful. Likewise, an electronic system for linking all food and feed regulatory groups can have a real impact on public health. Both of these ideas are included in AFDO's vision.

AFDO believes it is vitally important that we take a serious look at our food and animal health safety system and fundamentally change our current system to an integrated national program. As a prerequisite to accomplishing this task the roles and responsibilities at the state and local levels must be explicitly defined.

AFDO looks forward to meeting with CVM officials and discussing this vision. We believe it is a wise and practical approach and it would serve the public greatly. Thank you.

Respectfully submitted,

Joseph Corby

A handwritten signature in black ink, appearing to read "Joseph Corby". The signature is written in a cursive style with a large, looping initial "J" and a distinct "C" at the end.

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