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North Carolina NOV 20 09:53
Department of Agriculture
and Consumer Services
Food and Drug Protection Division

N. David Smith
Assistant Commissioner

E. Bruce Williams
Director

November 19, 2001

Dockets Management Branch, HFA-305
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Md. 20852.

Docket No. 01N-0423 "Animal Feed Rule Hearing"

To Whom It May Concern:

The State of North Carolina's Department of Agriculture and Consumer Services would like to respond to several questions that were to be addressed at the hearing held on October 30, 2001.

The first is regarding the exemption of the cautionary statement on pet foods. We would like to see the cautionary statement included on pet foods that are dry and in packages of five pounds or greater.

It would also be helpful to have the label clearly state the type of mammalian protein used in the production of the feed, e.g. "porcine MBM, bovine MBM, etc." Another option would be to have the manufacturer of the feed state that it does not contain restricted use proteins. The manufacturer would maintain adequate records to prove that prohibited products are not used in the feed. Either method would make the regulatory situation easier.

Finally, we would like to see the label changed to list the types of animals which should not receive the feed. Not all people purchasing feed are aware of the definition of ruminant animals. Listing all animals that are not to be fed the feed containing prohibited product would be beneficial to the user of the feed.

Sincerely,

E. Bruce Williams, Director
Food and Drug Protection Division, NCDA&CS

Cc: Meg Scott Phipps, Commissioner
Dr. David Marshall, State Veterinarian, Assistant Commissioner
N. David Smith, Assistant Commissioner
Sheila A. Jordan, Feed Administrator

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