

**Westwood Mink Corp.**

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0599 '03 FEB 19 15:02

February 13, 2003

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Re: Draft Guidance For Industry on Manufacture and Labeling of Raw Meat Foods  
for Companion and Captive Noncompanion Carnivores and Omnivores  
Docket No. 02D-0468

Dear Sir/Madam:

I am writing to provide comments to the draft guidance document referenced above. Specifically, I request that FDA exempt raw meat foods for fur farms from the guidance document.

I am a third generation mink farmer who has run my own farm for seven years, and I am personally very knowledgeable in the care and feeding of these animals. Mink are known as the "super duper recyclers," because they eat meats and other foods that would otherwise be discarded as waste. Spent cattle and chickens, damaged eggs, expired dairy products, meat and fish offal, and other by-products of the food industry are ideally suited for mink. Many fur farmers collect these leftovers themselves, from nearby slaughterhouses and packing plants, and mix the ingredients to ensure appropriate protein, fat and ash content for their animals' nutritional needs. Not only is this diet good for the animals, this recycling of waste is good for the environment.

From reading the draft guidance document, it is clear that FDA is concerned about "pet owners and pets" being exposed to pathogens and parasites from raw meat products. While that may be a valid concern, mink are not pets, and we are not pet owners. We are professionals raising carnivores in animal agriculture. We understand the dangers associated with raw meat, and we take appropriate measures to handle the meat safely. We also take every reasonable measure to protect the health of our animals. We are keenly aware of the dependence of our livelihood on our animals' health.

A mink consumes about 100 lbs of feed per year. Accordingly, feed is my business's largest cost. If I were forced to purchase meat manufactured and processed according to the proposed guidance document, it would substantially increase my feed costs -- for no legitimate health reasons.

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Mink farms are small businesses, and the increased feed cost would be a severe economic hardship that could put many of us under. Accordingly, I respectfully request that you exempt raw meat foods for fur farms from the guidance document.

Sincerely,

Paul Westwood

Paul Westwood

Utah mink farmer;

President, Fur Commission USA;

Board member, Fur Breeders Agricultural Cooperative;

Member, Utah Farm Bureau

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**Sending Secretary: Richard Isaacs**

**Secretary's Phone Number: 202-945-6643**

To:	COMPANY:	FAX No.	CONFIRMATION No.
<u>Dockets Management Branch (HFA-305)</u>	<u>Food and Drug Administration</u>	<u>301-827-6870</u>	<u>301-827-6860</u>

**FROM:** Ivan J. Wasserman **Direct Dial No.:** 2023428879

**DATE:** February 14, 2003

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