



Northwest Farm Food Co-op

Home Office:

1370 S. Anacortes Street • Burlington, Washington 98233 • (360) 757-4225 • Fax (360) 757-8206

February 27, 2003

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852
fdadockets@oc.fda.gov

Subject: Draft Guidance For Industry on Manufacture and Labeling of Raw Meat Foods for Companion and Captive Noncompanion Carnivores and Omnivores

Docket No. 02D-0468

Gentlemen:

I am writing to express my concern for the draft document referenced above. I specifically request that the FDA exempt raw meat products for fur farm animals from the guidance document.

I am the Controller for a small farm cooperative, which is owned by mink ranchers. Our plant is inspected by the USDA, but not as a plant that processes for human consumption. Our members are very aware of the nutritional requirements for caring for and feeding their animals to achieve high quality fur. Without that quality, the prices received by the ranchers would not sustain the industry. These animals eat raw meat products. Our company processes and freezes approximately 30 million pounds of raw poultry, fish, beef by-products and eggs for mink. These are products that come from USDA inspected plants, but are not suitable for human consumption. Without the mink industry, most of these products would go to landfill.

This industry competes on a worldwide basis. They are competing with fur ranchers in Denmark, Finland, Holland, Russia and now China is starting to grow mink. Feed is the largest cost of raising a mink. The additional costs associated with this proposal would, in my opinion, totally eliminate the mink industry in the United States. Ranchers cannot set the price of what they sell. The worldwide market sets the price so the increased costs cannot be passed on. This would divert many millions of pounds of meat by-products to landfill. I request that you exempt raw foods for fur farms from this guidance document.

Sincerely,
Northwest Farm Food Cooperative

Dale Lawson
Controller

02D-0468

C 12