



Heger
Company

the Profit Connection

1627 2003 13

March 6, 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Re: Draft Guidance For Industry on Manufacture and Labeling of Raw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 Ominivores Docket No. 02D-0468

To Whom it May Conern:

In reference to the above document, I request that the FDA exempt mink farms,
zoos, dog racing facilities and other professional establishments.

The Heger Company has been providing nutritional products and technical support
to mink ranchers for well over 50 years. Our expertise enables these farms to
provide high quality nutrition and care to their animals. These animals are not
"pets". The by-products from the food industry , packing plants, slaughterhouses
and fish processing plants are prepared in feed rooms not households. Raw meat
items that are questionable are tested in industry approved labs. Part of our servie
is to help our customers utilize " good manufacturing practices " in the preparation
and storage of their meat products to insure superior nutrition for their animals and
their safety.

These raw meats as well as other "waste" from the food industry would not easily
and economically be disposed of if it were not for mink farms. Hundreds of
millions of pounds of waste are fed through the mink farms in North Ameria each
year that could otherwise cause a problem for the environment. Currently this is a
"win-win" situation for both the food industry and the mink farming community.

I respectfully request that mink farms, zoos, dog racing facilities, and other
professional establishments be exempt from the guidance document proposed.

Sincerely,

Gregg "Whitie" Johnson
Heger Company

02D-0468

C13