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November 14, 2008

Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
FSIS Docket Room
1400 Independence Avenue, SW., Room 2534
Washington, DC 20250.

Re: Docket No. FSIS-2008-0026 Product Labeling: Use of the Animal Raising Claims in the Labeling of Meat and Poultry Products

Dear Sir or Madam:

I am writing on behalf of the American Veterinary Medical Association (AVMA), established in 1863 and the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, AVMA is the recognized national voice for the veterinary profession. The association's more than 76,000 members comprise approximately 86% of U.S. veterinarians, all of whom are involved in a myriad of areas of veterinary medical practice including private, corporate, academic, industrial, governmental, military, and public health services.

The AVMA appreciates the opportunity to provide comments on the proposed approaches that the USDA Food Safety and Inspection Service and the Agricultural Marketing Service may utilize to address claims on labeling of agricultural meat and poultry products.

The AVMA is equally concerned about the issues presented in the October 10, 2008 *Federal Register* notice and at the October 14, 2008 public hearing and proposes that the approach to the agencies evaluation of label claims for these products should be consistent with the AVMA policy that states:

Truthful and Non-misleading Human Food Labeling

The American Veterinary Medical Association (AVMA) supports truthful and non-misleading labeling of animal-derived human food products that meets the following criteria:

- 1) Claims on labels regarding production practices should be clear, unambiguous, scientifically valid, and verifiable.
- 2) Production practices specified in marketing programs and referenced by labels should not adversely diminish the health and welfare of the animals or increase the food safety risks of food products produced from these programs. Marketing entities should have safeguards and policies in place to ensure that specified production practices (such as restrictions on the use of approved animal drugs, including antibiotics) do not encourage managers to withhold needed treatment of sick animals or to refrain from seeking veterinary assistance when it otherwise would be indicated.

USDA FSIS Public Docket

Re: Docket No. FSIS-2008-0026 - Animal Raising Claims in the Labeling of Meat and Poultry Product Labeling

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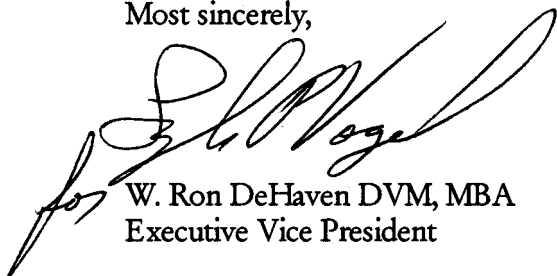
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- 3) Labels that state or imply claims of advantages for reduced food safety risks or improved animal welfare conditions compared to alternative production practices or methods should be based on verifiable scientific evidence supporting those enhanced claims.

The AVMA believes that such an approach, if applied in a uniform and consistent manner using science-based evidence to all agriculturally produced products, will provide the animal agriculture production and marketing industries, any standards setting organization, the agencies, and the consuming public with the greatest assurance that these products are safe, wholesome and are accurately labeled and packaged.

We thank you for the opportunity to provide input on this important matter.

Most sincerely,



W. Ron DeHaven DVM, MBA
Executive Vice President

AALC/ADS