

AVMA



American Veterinary Medical Association

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Division of Dockets Management [HFA-305]  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

**Re: Substances Prohibited From Use in Animal Food or Feed; Final Rule:  
Proposed Delay of Effective Date [Docket No. FDA-2002-N-0031] (formerly  
Docket No. 2002N-0273)**

Dear Madam/Sir:

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 78,000 members represent 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.

We acknowledge the Food and Drug Administration's efforts to further strengthen existing safeguards against bovine spongiform encephalopathy (BSE) through the "Substances Prohibited From Use in Animal Food or Feed" rule.

The AVMA has also become aware of persons experiencing difficulty as a result of the rule, particularly due to unintended consequences related to carcass disposal. Therefore, the AVMA supports a 60 day delay in the effective date of the rule. The AVMA also believes that a stay of the effective date should be granted, that the comment period should be reopened to allow for public comment, and that further action on the rule should be guided by the agency's review of, and response to the comments received as indicated in the petition for stay of action.

Please feel free to contact Dr. Christine Hoang (email: [choang@avma.org](mailto:choang@avma.org), or ext 6742) should you need any additional information or explanation of AVMA's comments.

Respectfully,

W. Ron DeHaven, DVM, MBA  
Executive Vice President  
American Veterinary Medical Association