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Division of Dockets Management (HFA-305)

Food and Drug Administration

5630 Fishers Lane

Room 1061

Rockville, MD 20852

Re: Docket/RIN No. 2003N-0400/0910-ZA21 – Control of Communicable Diseases; Restrictions on African Rodents, Prairie Dogs, and Certain Other Animals

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 75,000 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 commend the Food and Drug Administration's excellence in safeguarding the public's food and drugs, including animal feeds and drugs. We believe that the FDA's scientists and health professionals provide a superior level of expertise in their fields, and we commend the FDA for their science-based policies.

The AVMA would like to comment on the recent interim final rule published in the Federal Register on February 21, 2007, which contained new information that the FDA is considering in regards to the control of domestic monkeypox. After evaluation of this new information, the AVMA continues to recommend that, consistent with established AVMA positions (see below), the FDA continue to prohibit sale, distribution, and movements of animals that carry a risk of transmitting monkeypox. Any weakening or revocation of 21 CFR 1240.63 is inappropriate at this time. The existing approach, restricting both importation (under Centers for Disease Control and Prevention authority) and domestic sale and movement (under FDA authority), is necessary to protect human and animal health.

In addition, we offer the following general and specific comments regarding the regulation of all exotic animals.

General Comments

The AVMA supports science-based policies that promote public health and animal health and well-being. Until scientific findings show that exotic animals present no more than a negligible risk to human and animal health, the AVMA recommends that the FDA enforce regulations of intrastate and interstate movements of exotic animals and wildlife. Conversely, so long as scientific-based risk assessments and analyses show that there is a reasonable probability that such movement may spread diseases and threaten the health of humans, domestic animals or wildlife, the AVMA recommends that the appropriate federal and state agencies develop, implement, and enforce regulations regarding the movement of exotic animals and wildlife. This position recognizes that planned release and relocation, when carried out with adequate controls and planning by wildlife, agriculture, and public health authorities, are valid management tools.

The AVMA recommends development and implementation of a comprehensive approach to address the public and animal health risks associated with importation and domestic trade of exotic animals. The AVMA recommends that the FDA, under Centers for Disease Control and Prevention leadership, coordinate with other federal agencies, with the AVMA, and with other stakeholders to formulate effective policy addressing the issue of importation and domestic trade of exotic animals and their risks to public health.

The AVMA recommends limiting or prohibiting private ownership (“private” meaning individuals or entities not exempt to jurisdiction of the Animal Welfare Act) of wild animals that pose a significant risk to public health, domestic animal health, or the ecosystem. The AVMA especially supports regulatory efforts to prohibit private ownership of non-native wild animals, with the exception of special circumstances (such as recognized conservation and research programs).

We hope these comments provide the FDA with the input sought and we look forward to seeing science-based policy and regulations result. Please feel free to contact Dr. Lynne A. White (800-248-2862, ext. 6874) should you need any additional information or explanation of AVMA’s comments.

Very respectfully,

A

Bruce W. Little, DVM
Executive Vice President

BWL/LAW