

AVMA



American Veterinary Medical Association

1931 N. Meacham Rd.
Suite 100
Schaumburg, IL
60173-4360

phone 847.925.8070
800.248.2862
fax 847.925.1329
www.avma.org

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Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Re: Docket No. 2003N-0573 – Draft Animal Cloning Risk Assessment; Proposed Risk Management Plan; Draft Guidance for Industry; Availability

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.

FDA's Center for Veterinary Medicine (CVM) developed the draft animal cloning risk assessment to evaluate the food consumption risks that may result from edible products derived from animal clones or their progeny. The draft risk assessment finds that meat and milk from adult clones of cattle, pigs and goats, and their offspring, are as safe to eat as food from conventionally bred animals. An animal clone is a genetic copy of a donor animal, similar to identical twins but born at different times. Cloning is not the same as genetic engineering, which involves altering, adding or deleting DNA; cloning does not change the gene sequence.

The AVMA concurs that the cloning described in the draft risk assessment poses no food safety hazard. AVMA veterinary leaders with food safety and public health expertise have determined that the FDA's findings on cloned animal product safety are based upon sound science.

The AVMA applauds the FDA for performing the science-based risk analysis regarding the safety of food products from cloned animals. 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.

We look forward to future opportunities to provide our guidance to the FDA regarding public health- and animal health-related policies.

Please feel free to contact us should you need any additional information or explanation of AVMA's comments.

Very respectfully,

A handwritten signature in black ink that reads "Bruce W. Little". The signature is written in a cursive, flowing style.

Bruce W. Little, DVM
Executive Vice President

BWL/LAW