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May 27, 2008

Dr. Bernadette Dunham
Director
U.S. FDA Center for Veterinary Medicine
7519 Standish Place, Room 181
MPN IV (HFV 100)
Rockville, MD 20855

Dear Dr. Dunham:

The American Veterinary Medical Association (AVMA) applauds the Food and Drug Administration (FDA) for its continued leadership to protect public health through ensuring safe drugs and foods for people and feeds for animals.

While our country's food is among the safest in the world, we need to do more. We can never forget the tragedy of last year's pet food recall and the loss of too many of our nation's beloved pets. The AVMA appreciates the opportunity to continue the dialog with the FDA Center for Veterinary Medicine (CVM) in addressing the need for enhanced coordination of response to food and feed emergency events.

The AVMA encourages comprehensive, nationwide use of the National Incident Management System (NIMS), for all-hazards incident management, as outlined in Homeland Security Presidential Directive (HSPD)-5.

On February 28, 2003, President Bush signed HSPD-5, which directed the Department of Homeland Security to develop the National Incident Management System (NIMS). The NIMS is a nationwide, comprehensive approach to incident management that is applicable across jurisdictions and functional disciplines.

The nationwide pet food recall in 2007 exemplified the need for federal agency coordination and utilization of NIMS. Specifically, some elements that should be considered by federal agencies, such as the Food and Drug Administration (FDA) in the context of food and feed events, include the following:

- setting up a multiagency coordinating (MAC) group with all applicable agencies and non-governmental organizations, to develop policy to prepare for future events,
- setting up a multiagency unified command for efficient incident management in response to events,
- designing a Joint Information Center with all stakeholders to maintain updates and to provide advice during emergency response, and
- adopting the Joint Information System to effectively communicate and disseminate information to the public.

Since the FDA is the lead agency for response in feed and food events, it would be appropriate for the FDA to consider establishing a MAC. Possible representative stakeholders would include the FDA Center for Veterinary Medicine, the National Assembly of State Animal Health Officials, the National Association of State Departments of Agriculture, the United States Department of Agriculture (USDA) Food Safety Inspection Service, the USDA Animal and Plant Health Inspection service, the National Association of State Public Health Veterinarians, and the American Veterinary Medical Association.

The AVMA believes that implementation of NIMS will help to ensure an ever stronger food safety system for our nation. We appreciate the opportunity to relay our recommendation for the CVM's consideration, and we look forward to continuing the dialog with the FDA on this important issue.

Should you have any questions or concerns, please feel free to contact Dr. Christine Hoang (choang@avma.org or 800-248-2862 ext. 6742).

Respectfully,



W. Ron DeHaven, DVM, MBA
CEO
American Veterinary Medical Association