

# ***Fur Commission USA***

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February 28, 2003

## **VIA FACSIMILE AND FIRST CLASS MAIL**

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

Re: Draft Guidance For Industry on Manufacture and Labeling of Raw Meat Foods for  
Companion and Captive Noncompanion Carnivores and Omnivores  
Docket No. 02D-0468

Dear Madam/Sir:

Fur Commission USA represents over 600 mink-farming families on over 400 farms in 31 states. We are writing to provide comments on the draft guidance document referenced above (the "Draft Guidance"). Specifically, we request that FDA exempt raw meat foods for fur farms from the Draft Guidance.

### **I. Background on Fur Farming**

Most American fur farms are family businesses, often operated by two or three generations of the same family. A young farmer will typically take time out to gain a college or university degree in agriculture, biology or business, and then begin participating in the management of the family farm, eventually either taking over or leaving to start his or her own operation. This new operation, however, may still be under the umbrella of the family farm, with the result that one fur farm may actually comprise two or more operations next door to each other.

Providing animals with humane care is an ethical obligation of all livestock farmers, while for fur farmers it also makes good business sense, since the healthiest animals produce the finest pelts. As with all America's livestock producers, fur farmers are regulated by state departments of agriculture. In addition to meeting state requirements, fur farmers have developed a comprehensive set of their own standards, in consultation with veterinarians and animal

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scientists, to ensure the highest quality of animal husbandry. These standards are administered by Fur Commission USA, which is also responsible for ensuring they are revised and updated whenever required by current knowledge of animal care and farm management techniques. These standards cover:

- Farm Management
- Accommodations (site, sheds and pens)
- Food (nutrition, preparation, distribution)
- Watering Systems
- Animal Health and Disease Control
- Environmental Quality (sanitation, water quality)
- Transportation of Live Mink
- Euthanasia

Farmed mink play an important role in the agricultural chain, consuming large quantities of by-products from the production of human food, including raw meats from the beef, pork, and poultry industries. For example, in producing 100,000 mink pelts a year, one farm in Wisconsin feeds its animals 2 million pounds of expired cheeses and 1 million pounds of damaged eggs. Spent chickens and dairy cows, the inedible parts of beef cattle not sold for human consumption, even unsold meat and poultry from supermarkets, make excellent components of feed for mink. It is estimated that world-wide, fur farms consume over a billion pounds of these by-products annually.

The components of feed vary depending on what is available locally. In coastal regions, diets are likely to be based on fish. Elsewhere, fur farmers may rely on by-products from meat- and poultry-processing plants, or dairy producers. Diets are also supplemented as necessary with prepared rations sold by animal feed companies.

Most of these by-products are unsuitable for human consumption or inedible by humans, and those which are not sold to fur farms, pet-food producers, aquariums and zoos, etc., must be disposed of in landfills. By buying these by-products, fur farms reduce the waste generated by human food production, and also provide a source of revenue for other agricultural producers, effectively subsidizing food costs for consumers. Thus, the current feeding practices benefit not only the mink, but also the environment, the U.S. food industry, and the economy.

Most fur farmers collect these by-products themselves, personally visiting chicken farms, packing plants and slaughterhouses around their county. They then mix these ingredients on the farm, carefully measuring the protein, fat and ash content to ensure their animals receive the proper nutrition all year long. Some fur farmers form feed cooperatives to meet their feed needs. These cooperatives will collect the by-products discussed above and process them into feed. The feed is then delivered in tank trucks to the farms where it is pumped directly into holding tanks until it is ready to be used by the farmers. Some feed may be frozen by the cooperative until it is needed; however, the majority of the feed is consumed by the animals in a fresh state.

## II. The Draft Guidance

From the discussion in the background section, it is clear that FDA's primary reason for issuing the Draft Guidance is to "protect pet owners and pets from risks involving food safety." FDA discussed the long history of the use of foods containing raw meats by zoos, mink farms, and other professional facilities, and how FDA issued Compliance Policy Guide (CPG) 7126.23 which provides that such foods should only be investigated as a follow-up to complaints or reports of injury. FDA explained that when such foods are used by professional establishments there is a "presumption" that "the purchaser was aware of the potential risks of using such products, from both a food safety and nutritional deficiency perspective, and could take measures to mitigate those risks." Importantly, there is no allegation in the Draft Guidance that this "presumption" is no longer valid, or that CPG 7126.23 has not been sufficient to protect public health from the use of these foods by professional establishments.

The only reason expressed by FDA for issuing the Draft Guidance at this time is the "new trend . . . toward use of raw meat foods for companion and non-companion animals by owners who may not be as aware of the potential for harm." FDA concluded the background section by stating:

Therefore, for firms choosing to manufacture and market raw meat and raw animal tissue products for animal food, more specific guidance for industry is warranted for how such products could be manufactured and labeled in order to **protect pet owners and pets** from risks involving food safety, nutritional deficiency, and ensure compliance with the law.

(Emphasis added).

Thus, FDA implicitly acknowledged that no such guidance was warranted to protect domesticated non-companion carnivores, such as mink raised on fur farms, and their professional caretakers. However, without explanation, FDA included feed for such animals in the scope of the Draft Guidance.

The Draft Guidance, among other things, would require that all raw meat products used in mink feed be suitable for human consumption and be processed in ways typically used for human food products. As discussed below, these requirements would radically alter the way U.S. fur farmers feed their animals, and would result in significant costs for little, or no, public health benefit.

## III. The Draft Guidance Is Inappropriate For Professional Fur Farming Facilities

As discussed above, from reading the Draft Guidance, it is clear that FDA is concerned about "pet owners and pets" being exposed to pathogens and parasites from raw meat products. While that may be a valid concern, mink are not pets, and professional fur farmers are not pet owners. Fur farmers are professionals raising carnivores within animal agriculture. Fur farmers understand the concerns associated with raw meat, and fur farmers take appropriate measures to handle the meat safely. Indeed, we are not aware of any health complaints arising from the raw meat content of mink feed being reported by professional handlers.

Moreover, feeding domesticated mink raw meat products is consistent with the normal diet for such carnivores. Wild mink, from which farm-raised domesticated mink are descended, capture and kill their food, killing most of the small animals, birds and fish they feed on by biting them at the base of the skull or the nape of the neck. However, wild mink are also opportunistic feeders and will feed on carrion. Consistent with this, although domesticated mink feed is occasionally frozen until needed, the majority of the feed is provided to mink on the farm in a fresh state, often on the same day as processing, and it would be unreasonable and inconsistent with the diet of carnivorous mink to require the feed to be frozen prior to use.

Have there been many reports or complaints of injury under CPG 7126.23 relating to fur farms? If not, there is no justification for the severe economic hardship that the Draft Guidance would cause U.S. fur farmers to endure.

#### **IV. Unreasonable Economic Hardship**

One mink consumes about 100 pounds of feed per year, at a cost of roughly \$0.015 to 0.13 per pound delivered to the farm fresh, depending on the county. Accordingly, feed is any fur farm's largest cost. If fur farmers were forced to purchase feed manufactured according to the Draft Guidance, essentially making it feed of a standard fit for human consumption as might be found at any grocery store, this would increase the price of feed to around \$1.00 per pound. Also, the Draft Guidance's requirement that all feed be frozen until fed to the animals would mean an overwhelming investment in new delivery methods for all the farmers and would be a substantial financial burden to the farmers for no health benefit to them or their animals.

U.S. fur farmers currently compete with European mink farms that use a substantially similar feeding process as U.S. farmers. To comply with the Draft Guidance would put U.S. farmers at a crushing competitive disadvantage. European mink farming currently accounts for approximately 60 percent of world mink production, and is growing. U.S. output, meanwhile, has fallen to roughly 8 percent of world production, and will inevitably fall even further if the industry is faced with increased costs. Mink farms are small businesses, and the increased feed cost would result in a severe economic hardship that could force many out of business.

While the measures outlined in the Draft Guidance may not hurt the health of mink or farmers, there has been no showing that they will protect or improve their health, and they can and will do considerable harm in other ways. The Draft Guidance will cause the loss of jobs and farming businesses. Also, as discussed above, such unwarranted measures will hurt the environment due to the loss of fur farming jobs and their contribution to reducing waste from the human food production chain. The Draft Guidance will impact U.S. consumers in the form of higher costs for their food as human food producers pass on higher disposal costs for any portion of the food product not suitable or inedible for humans. Such costs can be justified only if they will reduce a real -- not theoretical -- risk to public health. No such risk exists here.

V. **Conclusion**

For the reasons discussed above, we respectfully request that FDA exempt raw meat for fur farmers from the Draft Guidance.

We are willing to answer any questions that you may have. Many of our farmers will be in Washington, D.C. during the first week of April and would welcome the opportunity to discuss the Draft Guidance with you. If you have any questions please contact me or our Washington, D.C. counsel, Ivan Wasserman at 202-342-8879.

Sincerely,

Teresa Platt

Teresa Platt  
Executive Director  
Fur Commission USA