GENERAL REVIEW AND ENFORCEMENT POLICIES

SURVEILLANCE AT PROFESSIONAL AND TRADE MEETINGS

One source of information regarding the activities of the animal products industry is the promotional materials used and distributed by firms at professional seminars, conventions and at trade conventions.

A product that is properly labeled on its immediate container can become a misbranded or adulterated drug, device, or food because of promotional literature presented at seminars or other professional meetings and at trade conventions.

I. Purpose:

The purpose of this document is to describe the procedures for submitting veterinary related literature obtained at professional meetings and trade conventions for regulatory follow-up.

II. Policy:

Center personnel attending seminars, society meetings and industrial exhibits, are requested to collect promotional material concerning unapproved animal products for submission to Division of Compliance for review and follow-up as necessary. The promotional material for approved veterinary products collected at these conferences should be submitted to Division of Surveillance for review and necessary action.

III. Procedures:

Submissions should be accompanied by a short note with the following information:

A. How the literature was displayed in relation to the products involved.

B. Whether the material was freely available to anyone, or had to be requested.

C. Whether a particular product was named in the display, or a generic group of

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products.

D. Whether the literature refers to a particular firm and product.

E. If a particular product is not named in the literature, whether one was mentioned verbally at the time that the written material was dispensed.

F. Whether additional material is available on request in writing.

G. Any verbal representations for the product made beyond those listed on the label.

By submitting information such as this, we have been able to stop the distribution of adulterated or misbranded products at any early stage in their marketing. It also provides a basis for monitoring the promotion of marketed products as a supplement to the animal drug experience reporting requirements.

IV. Prescription Drug Advertising:

An advertisement may be false, lacking in fair balance, or otherwise misleading, or otherwise violative of section 502(n) of the Act, as specified in 21 CFR 202.1. However, Part 202 applies only to prescription drug advertising. Over-the-Counter drug advertising is not regulated by the Food and Drug Administration.