MEMORANDUM

TO: All Feed Manufacturers

SUBJECT: Distributing Products Containing Glucosamine Hydrochloride and/or Chondroitin Sulfate.

The Texas Feed and Fertilizer Control Service has completed evaluation of the above mentioned ingredients and determined them to be safe when fed at levels not to exceed 15 mg/kg/day for glucosamine hydrochloride and 12 mg/kg/day for chondroitin sulfate in rations or supplements for adult dogs. However, this determination does not in any way imply an affirmation of GRAS or alter previous positions regarding the acceptability of these ingredients by any other agency, state or Federal. Nor does this affect any AAFCO position on the acceptability of these ingredients.

Labels which guarantee glucosamine hydrochloride and chondroitin sulfate must not have drug claims, must conform to the Texas Pet Food Rules (4 TAC 63), and must bear the disclaimers, "This compound is not recognized as an essential nutrient by the AAFCO dog food nutrient profile" and "This product is not intended to diagnose, cure or prevent any disease." We encourage the submission of all labels and labeling (i.e., brochures, pamphlets, etc.) for review to avoid any misunderstandings regarding the acceptability of any statements or claims.

Since these stipulations require label changes, the Service will allow distribution of products with existing labels if there are no violations of other feed rules until 31 August 1999. On 01 September 1999, products with labeling that does not conform to these requirements may not be distributed in Texas and any old-label products at distributors or large-volume pet chains must be removed from sale.

If there are any questions regarding this change in policy, please contact the Texas Feed and Fertilizer Control Service at (409) 845-1121.

A. Konrad Eugster
Associate Vice Chancellor of Agriculture