



NATIONAL RENDERERS ASSOCIATION, Inc.

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July 7, 2003

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

RE: Docket Number 03D-0186  
"Guidance for Industry: use of Material from Deer and Elk in Animal Feed"

To Whom it May Concern:

The National Renderers Association appreciates the opportunity to submit our comments in response to the draft guidance published May 14, 2003 by the Food and Drug Administration concerning the use of material from deer and elk in animal feed.

The National Renderers Association is the trade association for the rendering industry in the United States and Canada. There are 41 member companies that operate 183 rendering plants throughout the United States and Canada. Of our 41 member companies, 35 are independent renderers and six are packer renderers.

We represent well over 95% of the independent rendering industry in the United States and Canada.

The leadership of the NRA has met several times with FDA and CVM officials regarding the Chronic Wasting Disease (CWD) issue. We have offered our input in the disposal of deer and elk.

Rendered deer and elk represent a very small portion of the raw material processed by renderers every year. In fact many renderers do not render this material at all. However, rendering deer and elk during hunting seasons is very important for several renderers as they are providing a service to their regular processor suppliers. The volume of raw material is significant in some areas.

The NRA was invited by the FDA-CVM to participate at a CWD Workshop on May 16, 2003 at Rockville, Maryland. Several NRA members who are directly involved with the disposal of deer and elk in states where CWD is known to exist attended and

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participated at this workshop. We ask that their comments and presentations be considered as part of our comments to this draft guidance.

The NRA believes the BSE feed regulation (21 CFR 589.2000) was promulgated for the purpose of prohibiting certain feeds for ruminant animals. We believed this was to include deer and elk. However, FDA has determined otherwise as it relates to CWD.

The FDA has now determined that material from CWD-positive animals may not be used in any animal feed or feed ingredients. It also recommends that material from animals from high-risk areas no longer be entered into the animal feed system.

We appreciate that FDA in section V of the draft guidance continues to consider materials from deer and elk not considered at high risk for CWD to be acceptable for use in non-ruminant animal feeds in accordance with current agency regulations 21 CFR 589.2000.

We do question why animals from high-risk areas that test negative to CWD would not be eligible to be in accordance with the feed regulation as well.

NRA members are making individual decisions on the handling of deer and elk. Our members who choose to continue rendering deer and elk are aware of the draft guidance and will be in accordance.

Additional rules and regulations are not necessary and we do not recommend any further rulemaking beyond the guidance.

If we can be of any further assistance, please feel free to call on us.

Sincerely,

  
Thomas M. Cook  
President