



"Improve the economic well-being of agriculture and enrich the quality of farm family life."

August 9, 2004

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

In reply to: Docket No. 2004N0264

The Illinois Farm Bureau appreciates the opportunity to comment on the USDA and FDA's Advance Notice of Public Rulemaking. The issues of animal identification, BSE, and food security are of the utmost importance to our organization and we have a strong interest from our members in this area.

We are very supportive of USDA's suggestion regarding the establishment of a special advisory committee on BSE. We would strongly urge that there be a significant producer presence in this committee to ensure grassroots input is being provided. For example, USDA's decision to announce all "inconclusive" results for BSE would have been a good topic on which to gather industry input.

Our policy is very specific regarding our support for extending the ruminant meat and bone meal (RMBM) feed ban to poultry feed and pet food. This is a "hole" in the system that needs to be plugged. One method to achieve this result would be to prohibit the use of specific risk material (SRM) and RMBM in poultry feed and pet food. We certainly realize this may create some negative repercussions for the rendering industry. A more palatable alternative, that would achieve the same end, would be to prohibit the practice of feeding poultry litter and pet food to cattle. This is the most science-based, logical approach to "break the chain."

In Illinois, our Department of Agriculture offered a \$300/head bounty on all non-ambulatory animals that were on the farm. IDOA also paid one-way loaded mileage to either of the state's labs. The \$40,000 IDOA had originally allocated for this effort was used up in a matter of weeks. We believe that USDA should consider offering a program that will reimburse livestock producers who submit the heads of "fallen stock" on the farm. This will enhance an aggressive surveillance program for USDA and monitor some of the country's highest risk animals that are now, ironically, out of the surveillance system. In addition, USDA should re-examine its definition of "downer" livestock. Animals that are non-ambulatory due to a broken limb or dystocia, for example, should still be allowed to be marketed for human consumption. In our opinion, the downer ban is too broad and excludes perfectly safe protein for human consumption. This is a very expensive cost to the producer and to the industry.

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We are also supportive of a uniform, national animal identification system provided it is not economically burdensome to producers. We are supportive of the rationale for a voluntary system at this stage. We realize for the system to work and protect the nation's high standards of animal health a program like this ultimately needs to be mandatory. However, before a mandatory animal identification program is implemented the country's livestock producers need to be assured that the data remains confidential and is only accessed in the event of an animal disease outbreak. Farmland security issues should be the primary reason this information be exempt from any attempts to access it under the Freedom of Information Act. Eventually, stockmen may choose to utilize some of this information so production data may be shared with others in the food system. Logically, cattle should be the first species to be regulated under an animal identification system.

We are also appreciative of the work of USDA and its involvement in the U.S. Animal Identification Plan (USAIP) and the National Animal Identification System (NAIS). Their work toward a standardized format will help ensure that producers will continue to have access to packers and that no one packer will be able to exert a technological advantage over another at the producers' expense. This point is critically important if our producers are to remain profitable and viable!

Thank you again for the opportunity to comment on these key issues.

Sincerely,

ILLINOIS FARM BUREAU®



Philip Nelson
President

JRF