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July 29, 2004

RE: Industry actions and plans regarding FDA/USDA Advanced Notice of Proposed Rulemaking, Interim Final Rule, Proposed Rule

This is in response to the proposed rule making as it relates to BSE and the standards for our country. It is my opinion that these rules are unnecessary due to the fact that we have a feed rule that went into effect in 1997 that is over 99% in compliance. Being that we have not found a BSE animal to the United States yet, I feel that this rule making is premature. It is somewhat irresponsible at this point to cause a major economic impact into several industries that provide for good jobs and excellent tax basis for State and local government in the United States. There is absolutely no reason scientifically that anything other than the current feed ban should be implemented at this time. Even if there were cases of BSE in the United States, there is no scientific proof to pull any of these ruminant products out of the poultry feed rations or swine. Primarily because these animals are slaughtered at such a young age that the incubation period of three plus years would not come into effect. The problem with pulling products and starting down this slippery slope is that you are starting to put in question the ability to feed animal proteins and fats and oils to animals in general, which has been a very valuable service and value added product to these industries for quite some time now. These products are encouraged to be recycled because the added value at the end of the rendering process. The rendering process, because we have continuing pressure environmentally and an energy standpoint, has become more expensive to operate facilities every year. If we take these markets away, we start adding an extra burden of cost not only to our food chain, but also we stress the point of illegal and landfill disposal. In my opinion this is unreasonable to even consider these rules to encourage this type of activity when in fact, if we remove SRMs and slaughter young cattle, there is very little chance of humans receiving BSE from these products. What we do, however, is add a significant health threat, more than BSE, to our nation and the people in it. We stand to affect our ground water, other diseases to be carried by rodents and fowl and we could have wide-spread hysteria and diseases that would be out of control that would make BSE look like a grain of sand on an entire beach next to our seashores. I feel that this needs to stop, take serious looks at what total impacts can be done to these industries, to our national economy and to our national environment over the next 20 to 30 years with these concerning thoughts and comments of changing these feed rules.

As it relates to poultry litter, if treated properly, has been a valuable food stock to cattle. However, it has far less value than do rendered products as a feed. Therefore, if you want to encourage a product to become an energy source as fuel substitute, it is in my opinion, far greater and better benefit for us to consider solid fuel disposal of poultry and/or further processing of making gases and other fuels from manure. There are concepts out here today that will do this and it will be much more greater bang for buck ecologically to have these products turned into fuel than our valuable feed ingredients that have been known for 20 years to help grow more efficient animals and use less land and less resources to help grow our food and be competitive in the world market. For these reasons, I think these feed rules, until further testing and evaluation and confirming a case of BSE natural to the United States, make absolutely no sense and instead will cause major problems for our national economy and our natural resources. For these reasons, I have answered the questions in the following manner, very simplistic and very straight to the point that there is no scientific based reasons for any of these rule changes at the present time and we would thank you for your consideration to discontinue in these procedures or act very cautiously in these procedures of what affects do you really intend to have to our country and to industries and to our population and environment as a whole.

Thank you very much.

Michael A. Smith
Vice President

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