

ALFALFA COUNTY FEEDERS, INC.

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November 30, 2005

Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Docket No. 2002N-0273
RIN 0910-AF46

To Whom It May Concern:

I am writing to express my opposition to the proposed FDA rule regarding the use of cattle materials in animal feed. This new rule would potentially create an unnecessary hardship on farmers and cattle producers in the U.S. by removing the means to economically dispose of dead animals.

There does not appear to be any scientific reason to change the rule that has been in place and working since 1997. The current government's testing program has tested over 500,000 animals and only one has tested positive for BSE. The one positive test was in an animal that was born before the current rule went into effect. No material from that animal got into the feed chain. The current rule for testing and surveillance is working.

The new rule will force the companies that take dead animals for feed use to stop that practice or to charge such high rates that it would put a serious economic strain on the farmers and cattle producers. The alternative disposal means, such as burying the animals, are also expensive and a potential environmental disaster. We will see much tighter environmental regulations and fewer places to dispose of the material.

The new rule puts an undue burden on what is an already economically marginal business and is unnecessary given the current level of scientific knowledge. I strongly urge the FDA not to adopt the new rule.

Sincerely,

ALFALFA COUNTY FEEDERS, INC.



Tom Kraus
Manager

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