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November 9, 2005

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

Dear Sir;

We understand that FDA has proposed to eliminate animal protein in animal feeds. Previously, in 1997, FDA created a ruminant-to-ruminant feeding ban to reinforce efforts to reduce the risk of BSE in the United States. This program has been successful with over 99.5% compliance by the feed industry, rendering industry and those who use feed in the United States.

It appears that additional regulation of animal protein feeding is unwarranted for reducing the risk of BSE. Restrictions of animal movement into the United States from other countries and testing of suspect animals has been sufficient to keep the threat of BSE very low.

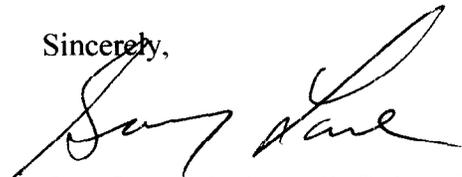
The Harvard University BSE assessment study, headed by Dr. Grey, clearly showed that the BSE threat in the United States is very low, so low that it is practically impossible to calculate.

These proposed restrictions are financially and environmentally disastrous to the United States Agricultural Community. The restriction will result in cessation of dead animal removal in Kentucky and other states creating a greater risk to the general public. Livestock producers and dairymen will have nowhere to turn for disposal. There will be increased human exposure to pathogens through handling of dead animals, polluted streams and danger to pets and wildlife.

There is no need for further restrictions to protect citizens of the United States. The current ruminant-to-ruminant ban is sufficient to reduce the risk of BSE. Also, current USDA surveillance shows we do not have a BSE risk in the United States cattle population.

We urge you to support the agricultural community and not allow these proposed restrictions to become effective.

Sincerely,



Gary Lane, Ph.D., PAS, Dpl., ACAN
Director of Technical Service

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