



## Kentucky Farm Bureau Federation

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December 15, 2005

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

To Whom It May Concern:

Recently, FDA published a proposed rule to eliminate ruminant animal protein entirely from animal feeds. Rules for animal feeds established in August of 1997 pertaining to use of animal proteins have been successful, with over 99.5% compliance by renderers, feed mills and feed users throughout the United States.

The Harvard Risk Analysis of the current BSE threat clearly indicates the threat in the United States is extremely low. What we have in place is clearly working, and any further regulation of animal feeds is unwarranted.

The proposed rule change also has the potential to significantly affect not only livestock producers financially, but our environment as well. Where will livestock producers dispose of dead animals if this rule goes into effect? Currently, producers can properly dispose of their livestock carcasses through regional rendering plants. This newly proposed restriction would essentially eliminate that alternative for dead animal disposal. Enacting the proposed rule will also lead to increased human health hazards, more exposure to pets and wildlife and the potential for seriously polluted groundwater and streams from improperly disposed of animal carcasses.

Effective, scientifically-based safeguards are already in existence that have resulted in an extremely small risk of BSE here in the United States from feed sources being produced under current regulations. There is no need for further restrictions. Enacting this proposed rule change pertaining to livestock feeds will only create economic hardships on the agriculture industry, while potentially creating a major environmental hazard in rural America.

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*"Voice of Kentucky Agriculture"*

I urge you on behalf of Kentucky Farm Bureau's 447,000 members to reconsider this proposed rule change. The current ruminant-to-ruminant ban has created a safe feed source for American livestock. We urge you to support the American farmer and livestock industry, along with our rural citizens, and ***not enact*** this proposed rule.

Sincerely,

A handwritten signature in cursive script that reads "Marshall Coyle".

Marshall Coyle  
President, Kentucky Farm Bureau Federation

cc: Kentucky Congressional Delegation  
Kentucky Department of Agriculture  
Mark Haney, 1<sup>st</sup> Vice President  
John Hendricks, 2<sup>nd</sup> Vice President  
Kentucky Farm Bureau Board of Directors  
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