



AMERICAN FARM BUREAU FEDERATION®

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

To Whom It May Concern:

The American Farm Bureau Federation (AFBF) appreciates the opportunity to submit initial comments on the proposed Animal Feed Safety System (AFSS). AFBF represents a diverse membership comprised of producers who raise all classes of livestock and poultry. Consequently, the proposed AFSS will affect most of our animal production membership.

AFBF monitors initiatives designed to improve and streamline food safety to ensure that policies and procedures are in place that build trust and reliability in U.S. agriculture. Recognizing that animal feed safety is one facet of ensuring food safety, we support developing an AFSS which is intended to minimize risk to animal and public health through the use of risk-based, preventive, and comprehensive animal feed control measures. AFBF encourages the Food and Drug Administration (FDA) to continue its efforts to educate the industry on the developments of the AFSS through the dissemination of literature and public meetings.

During discussions at the April 2005 public meeting, we learned that the AFSS is tentatively planning to include all segments of the animal feed system, from raw material suppliers to manufacturers to transporters. Significantly, this effort could potentially include all producers who manufacture their own feed.

At this point, FDA has not established the definition of "manufacture." In speaking to one FDA official, we understand that it could possibly encompass someone who harvests corn and grinds it as feed for animals on their farm. Overly broad definitions may unnecessarily impact thousands of producers with little added value to feed safety. Therefore, we urge FDA to avoid any interpretation of the law beyond the scope spelled out by Congress and to carefully consider all of the ramifications of this system, especially the ability of the system to be effective and add benefit as well as the agency's capability to enforce the requirements.

We offer our assistance and resources as the FDA continues to develop and implement the AFSS. We thank you for the opportunity to provide input on the proposed AFSS, and look forward to a collaborative working relationship on this issue.

Sincerely,

Mark Maslyn
Executive Director
Public Policy

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