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 08/06/2004 08:35 AM

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 cc:
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 Subject:"Docket No. 04-047-1"

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 July 30, 2004
 Docket No. 04-047-1
 Regulatory Analysis and Development
 PPD, APHIS, Station 3C71
 4700 River Road Unit 118
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To Whom It May Concern:

We are writing in response to Docket No. 04-047-1 and the agency's solicitation for commen

1. Would there be value in establishing a specialized advisory committee or standing subco
 NBP believes establishing a standing subcommittee on BSE makes sense in light of the recen

4. If SRMs are prohibited from animal feed, should the list of SRMs be the same list as fo

As APHIS suggests, a staged approach may be necessary to permit the development of an infr
 a. There is very little potential infectivity associated with proteins from these material
 b. These animals were all born well after good compliance with the FDA feed rule had been
 c. It will reduce the amount of SRMs from slaughter cattle requiring alternative disposal

7. What would be the economic and environmental impacts of prohibiting SRMs from use in al

The economic and environmental impacts will be influenced by at least a couple of factors.

If renderers are not allowed to remove SRMs from cattle mortalities, they will most likely

SRMs removed at slaughter may still be rendered to recover the fat. If so, only the prote

Finally, the landfill and transportation cost to dispose of the protein meals generated fr

In addition to the economic impact, the disposal of non-rendered dead stock cattle, non-am

In actuality, the number of landfills capable of handling this material would be limited s

Other disposal methods such as carcass abandonment are not attractive and in most States i

That leaves incineration and chemical digestion as acceptable means of disposal. While bo
 NBP views the need to uniformly regulate the disposal of these infectious tissues as a pri

9. What information, especially scientific data, is available to show that dedicated
 facilities, equipment, storage, and transportation are necessary to ensure that cross cont
 If FDA were to prohibit SRMs from animal feed and feed ingredients, there would be no need

As the rule pertains to rendering, dedicated lines should be defined as the equipment used

2004N-0264

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The current FDA "feed rule" (CFR21 589.2000) allows renderers to use an approved clean-out

- 1. Without a mechanism to safely process both categories of materials, fewer
- 2. In order for renderers to participate in government sponsored disease erad
- 3. A rendering facility that historically processes SRM material and wishes t
- 4. In the event a rendering facility processes material it later learns conta

We propose that independent renderers work with FDA through the rulemaking process to reev

The issue of dedicated transport should be investigated for both raw materials and finishe

The segregation of raw material during collection will be dictated by their source. SRM c

Requiring dedicated vehicles for each type of raw material is not economically feasible.

NBP has estimated the costs of requiring dedicated vehicles to handle segregated dead stoc

NBP has a good estimate of our share of the national quantity of dead stock cattle and loc

So we propose that independent renderers work with FDA through the rulemaking process to d

The transport of finished rendered proteins by railcar and truck is another issue. The use

The feed ingredient and agricultural commodity industries use a network of independent tru

The cost of transporting prohibited proteins will more than double if dedicated trucks are

Since most independent renderers do not have their own truck fleets for finished products

An approved clean-out SOP for vehicles is consistent with the FDA's intent of preventing c

22. What would be the economic and environmental impacts of prohibiting materials from dea

Historically, NBP has not handled non-ambulatory disabled cattle. So other than the follo

If renderers are not allowed to remove SRMs from cattle mortalities the value of entire ca

Alternatives such as carcass abandonment, on-farm burial, composting, and incineration app

In attempts to remedy this emerging threat over the past two years, NRA members alerted th

That APHIS and/or other appropriate federal agencies address this sanitation issue and dev

- 1. Regulations requiring that raw animal by-products and mortalities be prope
- 2. Federal licensing standards requiring that all options used for the dispos

In a further attempt in January 2004, NBP and Darling International provided the USDA and

In summary, unless independent renderers are able to salvage enough value from the carcass

23. What other innovative solutions could be explored?

No comment.

24. When and under what circumstances should the program transition from voluntary to mand

While NBP does not have a comment regarding the voluntary or mandatory nature of the anima

25. What species should be covered, both initially and in the longer term? Specifically, s

No comment.

26. How can training and educational materials be designed or improved to meet the needs o
Assuming the Agency will try to achieve a uniform understanding among inspectors and those

27. How can the Federal Government increase access to these materials?

Making this type of material available on the Internet provides rapid and widespread disse

31. Are there other, related legal issues on which FDA should focus?

We want to remind the Agency again that steps to further restrict the use of certain cattl

National By-Products thanks APHIS for the opportunity to make comments as it examines meas

Respectfully,

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