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August 11, 2004

VIA FAX:
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US Food & Drug Administration
Division of Dockets Management
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Re: Docket No. 2004N-0257
Proposed Rule: Recordkeeping Requirements for Human Food and
Cosmetics Manufactured From, Processed With, or Otherwise
Containing, Material From Cattle.

To whom it may concern:

The following comments are submitted on behalf of Darling International Inc. ("Darling"), in response to the above Notice, issued by the US Department of Health and Human Services, Food and Drug Administration (FDA), Docket No. 2004N-0257. The FDA is currently soliciting public comments regarding recordkeeping requirements for manufacturers and processors of human food and cosmetics that are manufactured from, processed with, or otherwise contain, material from cattle, in order to ensure that these products do not contain prohibited cattle materials. The Proposed Rule has been issued as a companion rulemaking to the FDA's Interim Final Rule (IFR) entitled Use of Materials Derived From Cattle in Human Food and Cosmetics, also published on July 14, 2004.

It is our understanding from our discussions with the FDA, that it is the agency's position that the record-keeping responsibilities under both the IFR and the Proposed Rule were placed only on the manufacturer of the human food or cosmetic, and that ingredient suppliers, such as Darling, had no responsibilities for record-keeping under either the Interim Final Rule or the Proposed Rule. Darling requests that the FDA clarify this issue by clearly stating this position when the agency issues its final version of these rules.

Very truly yours,
Darling International Inc

James Ransweiler,
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