



AMERICAN FARM BUREAU FEDERATION®

600 Maryland Avenue S.W. • Suite 800 • Washington, DC • 20024 • (202)406-3600 • fax (202)406-3604 • www.fb.org

6815 04 AUG 13 7:123

August 13, 2004

Docket No: 2004N-0264
Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Dear Sir or Madam:

The American Farm Bureau Federation appreciates the opportunity to comment on the Food and Drug Administration (FDA) Advance Notice of Proposed Rulemaking (ANPRM) on federal measures to mitigate bovine spongiform encephalopathy (BSE) risks {69 Fed. Reg. 42288 (July 14, 2004)}. After the identification of BSE in an imported Canadian cow in Washington, the U.S. Department of Agriculture (USDA) responded rapidly to implement measures to protect public health. Given what is known about the epidemiology and characteristically long incubation period of BSE, it is also appropriate that the FDA consider additional actions which may further reduce and/or eliminate the risk of BSE recycling in the U.S. cattle herd.

We have worked with FDA and USDA to implement the BSE protections enacted during the last decade. Our members realize the importance of and support the current feed ban, which went into effect in 1997. We continue to share FDA's commitment for a strong BSE risk control program that is based on scientific facts and has a practical application.

Farm Bureau supports banning the inclusion in ruminant feeds of any animal proteins scientifically shown to transmit BSE. The ANPRM indicates FDA is considering adding other provisions to the current feed ban. We ask that FDA analyze the impact of changes to the feed ban as they relate not only to ruminants, but also to other species such as poultry and swine. We urge FDA to evaluate the various options available through a rigorous cost/benefit analysis to determine the feasibility, appropriateness and effectiveness of various BSE mitigation techniques. For example, FDA should look at the cost and logistics of prohibiting Specified Risk Materials (SRMs) in all animal feed to prevent exposure to ruminants through cross contamination and cross feeding versus prohibiting ruminant animal proteins in poultry feeds.

Recently, USDA expanded its surveillance program to determine if BSE exists within the indigenous U.S. cattle herd, beyond imported animals. This program, an animal disease-monitoring program, has been operational for slightly more than 60 days. Experience in other countries has shown that BSE surveillance provides information that assists in evaluating the effectiveness of past control measures. We urge FDA to work with USDA and also take their surveillance data into consideration when determining the extent of necessary BSE risk mitigation measures.

2004N-0264

C81

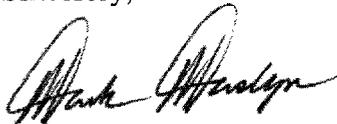
Farmers and ranchers understand that compliance with the current feed ban is imperative. Some changes to the labels required on animal feed may assist with on-farm compliance. Livestock feed labels should provide clear, concise and accurate information regarding ingredients and nutritional information. The FDA and state feed control officials should consider making modifications in labeling requirements by developing more specific classifications of animal protein sources such as "non-ruminant derived animal proteins," "ruminant derived animal proteins" and "non-mammalian derived animal proteins" to provide producers with the information they need to make the certifications about feeding practices that the marketplace is demanding. We do not believe that it is necessary to label feed ingredients according to species origin. We support the use of the current warning statement of feed labels that states, "Do not feed to cattle or other ruminants" if the feed contains ingredients that are prohibited to be fed to ruminants by FDA.

AFBF urges FDA and other relevant U.S. government agencies to work with academia and industry on research in the following areas:

- Methods to inactivate TSE agents which then may allow a product to be used and even fed to animals without risk; and
- Alternative uses for animal by-products that would maintain their value.

Farm Bureau will continue to work with the FDA and other government agencies to implement a strong BSE risk control program that is based on scientific facts and has a practical application. Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Maslyn". The signature is fluid and cursive, with the first name "Mark" being the most prominent.

Mark A. Maslyn
Executive Director
Public Policy