



CANADIAN MEAT COUNCIL
CONSEIL DES VIANDES DU CANADA

Canadian Meat Council Comments:

Proposed Rule

Department of Health and Human Services

Food and Drug Administration

21 CFR Part 589

RIN 0910-AF46

Substances Prohibited From Use on Animal Food or Feed

The Canadian Meat Council wishes to offer the following comments on the proposed rule (RIN 0910-AF 589) published in the Federal Register, Volume 70, number 193, October 6, 2005 (*Substances Prohibited from Use in Animal Food or Feed*).

The Canadian Meat Council is Canada's national trade association of federally inspected meat packers and processors. The red meat industry is the largest of Canada's food processing industry and the fourth largest of all manufacturing industries in the country with annual sales of over \$15 billion. The industry employs directly over 34,000 Canadians and is a major exporter of Canadian agri-food products.

The Canadian Meat Council applauds the efforts of the Government of the United States and specifically the Food and Drug Administration for the initiative and effort to protect the health of Americans and to control the spread of bovine spongiform encephalopathy (BSE) in North America's beef herd. The Canadian beef industry operates in a global environment and is reliant on export markets for continued viability. The North American market dominates trade activities for Canadian Meat Council members therefore it is critical that our members be able to move product freely with counterparts in the United States. Thus any proposed regulatory initiative that detracts from such a status is cause for concern.

The Canadian Meat Council supports the removal from the feed chain of SRM from cattle. Notably, the US Final Rule on BSE and Minimal-Risk Regions published January 4, 2005 does not distinguish between Canadian and US cattle under 30 months of age concerning SRM material when slaughtered in US plants. In this regard, the Canadian

Meat Council is encouraged by the Proposal to consider implementation of the following science based approach measures;

- remove mature dead & downer cattle from the feed supply, and
- remove brain and spinal cord from cattle over 30 months at slaughter.

A harmonized approach with US counterparts is the Canadian Meat Council's preferred approach.

In Conclusion:

The Canadian red meat industry has been seriously affected by the discovery of BSE in the Canadian beef herd. The Canadian Meat Council supports measures to eliminate the possible spread of this disease in Canada and trading nations.