



ALLEN CO. CONSERVATION DISTRICT
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December 6, 2005

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

To Whom It May Concern,

I would like to address the issue of the proposed amendment to regulations to prohibit the use of certain cattle origin materials in the food or feed of all animals. This is the removal of brains and spinal cords for cattle 30 months of age or older: the entire carcass of any cattle not inspected and passed for human consumption unless the brain and spinal cord have been removed, including dead cattle and calves and nonambulatory livestock: and mechanically separated beef derived from any of the materials prohibited by the proposed rule.

I feel there is no need for additional feed restrictions based on current compliance. The current ruminant to ruminant feed ban created in 1997 has been in force longer than most living animals and within two years will have survived all living cattle. The current USSDA Surveillance Program clearly shows we do not have a BSE risk to the United States cattle populations and support the data of the Harvard Risk Analysis Study. The FDA must maintain its regulatory decisions based on science, not political or international trade influence.

The FDA must conduct an environmental assessment of the animal disposal issue created by this proposed regulation and the associated animal and human health concerns created by improper disposal and the increase cost associated by such action. With such action proposed by the federal agency with no enforcement ability, how will the FDA fund the state agencies that must deal with animal disposal and increased human health problems associated with animal disposal? We feel many dead animals will be disposal of in ways that could cause even more health problems such as pollution of our streams and groundwater. This service is greatly needed in our community, and we do not feel that without the company's services our community will benefit for the better, but instead the opposite.

Please reconsider this proposal. Thank you for your assistance in this matter.

Randy Harston,
Conservation District Secretary

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