





"In unity there is strength"

P.O. Box 355 • Lehi, Utah 84043 Phone (801) 368-7403 Fax: (801) 768-2683

May 10, 2004

FSIS Docket Clerk Docket #03-025IF Room 102, Cotton Annex 300 12th and C Street, SW Washington, DC 20250-3700

Re: Docket No. 03-025IF, Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle; Interim final rule and request for comments

Dear Sir or Madam:

The following comments are being submitted on behalf of the Utah Dairymen's Association (UDA) to USDA's Interim Final Rule and Request for Comments entitled Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle (Docket No. 03-025IF). UDA represents the dairy producer families of Utah.

UDA shares the concerns of National Milk Producers Federation (NMPF) and supports the NMPF in its view that the new requirement to condemn all non-ambulatory disabled cattle presented for slaughter may have a severe economic impact on producers while not providing any real protection to consumers.

UDA and NMPF are concerned that the current USDA definition of non-ambulatory disabled livestock may be too broad. As such, it is unnecessarily prohibiting some animals from the human food supply. If these animals are condemned, rather than slaughtered, then producers will suffer an unnecessary economic loss.

UDA is hopeful that FSIS will adopt a safe, humane protocol to permit dairy producers to salvage a significant portion of the lost value from animals that become physically impaired, but do not pose any BSE or human food safety risk.

Sincerely,

Gregøry J. Radmall Executive Director