

Porretta, Mary

From: Engeljohn, Daniel
Sent: Friday, May 07, 2004 5:06 PM
To: Riley, Mary; Hall, Julie; Dickey, Lynn; Brown, Jeff; Porretta, Mary; Jennings, Barbara
Subject: FW: Docket No. 03-025IF, Docket No. 01-033IF, Docket No. 03-038IF

This is an official comment (that couldn't be sent via the e-comment process). Thanks.



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-----Original Message-----

From: Shannon Standley [mailto:shannon@tcfa.org]
Sent: Friday, May 07, 2004 5:00 PM
To: daniel.engeljohn@fsis.usda.gov
Subject: Docket No. 03-025IF, Docket No. 01-033IF, Docket No. 03-038IF

Please accept this comment via email as we were unable to submit online.
Thank you.

May 7, 2004

FSIS Docket Clerk
Room 102, Cotton Annex
300 12th Street SW
Washington, DC 20250

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"

Docket No. 01-033IF: "Prohibition of the Use of Certain Stunning Devices Used to Immobilize Cattle During Slaughter"

Docket No. 03-038IF: "Meat Produced by Advanced Meat/Bone Separation Machinery and Meat Recovery (AMR) Systems"

Texas Cattle Feeders Association (TCFA) appreciates the opportunity to comment on these proposed rules. TCFA represents the cattle feeding industry in Texas, Oklahoma and New Mexico that produces approximately one-third of U.S. fed beef production.

We understand the urgency of these measures and support them being implemented as interim rules. However, we urge FSIS to strongly consider all comments received and to weigh the results of the enhanced surveillance program announced on March 15, 2004 to determine if these are the appropriate measures based on the true risk presented in the U.S.

These rules should continue to be interim, not final rules until the results of the enhanced surveillance program announced on March 15, 2004, are known. These rules are only needed while an assessment of the firewalls that were in place before December 23, 2003, is made. Hopefully, the enhanced surveillance testing of over 200,000 head will show that previous firewalls are more than adequate.

Our goal should be to return to using some if not all SRMs and to permit the use of AMR. These products and procedures are significant contributors to the economies of the U.S. beef industry.

TCFA strongly encourages FSIS to evaluate the science-based, international standards from the World Organization for Animal Health (OIE), and the risk of BSE in the U.S. on an on-going basis and make any necessary changes to this policy based upon that evaluation.

Specified Risk Materials. TCFA supports the temporary listing of the following as specified risk materials (SRM) from cattle over 30 months of age: brain, skull, eyes, trigeminal ganglia, spinal cord and vertebral column (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum), and dorsal root ganglia. TCFA also supports the distal ileum and tonsils from all cattle as SRMs. However, we encourage USDA to seriously consider if all of these items have to be removed since only the brain, spinal cord and retina of the eye have been shown to harbor infectivity in animals that have naturally contracted BSE.

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Distal Ileum. TCFA agrees that the distal ileum is a SRM and should be removed from all cattle. However, we disagree with the proposal to require the removal of "small intestine" from all cattle in order to ensure removal of the distal ileum. The infective agent for BSE has only been found in the distal ileum of cattle which were inoculated with the BSE infective agent.

Verification of Age. TCFA supports the use of documentation or dentition to identify cattle over 30 months of age. We believe using the eruption of one of the 2nd set of permanent incisors to identify cattle over 30 months of age is an extremely conservative approach. That is, the cattle will be less than 30 months.

Non-Ambulatory. TCFA requests that FSIS institute a mechanism that allows cattle with injuries that occur in loading or transportation to be processed for personal consumption. FSIS should remove the designation that these animals are adulterated and allow locker plants and custom slaughterers to harvest these animals and remove the SRMs.

Air-Injection Stunning. TCFA supports this interim final rule to ban air-injection stunners from use in cattle slaughter. It is important to have the regulation to help facilitate exports of U.S. products and to ensure the safety of imported beef products into the U.S.

Advanced Meat Recovery (AMR). TCFA supports the interim rules on AMR but questions whether this should be a permanent change if proper industry practices are followed.

In summary, TCFA commends USDA for taking further actions while a thorough assessment of increased surveillance is completed. However, these regulations should be considered as interim because at this time there has not been a case of BSE that originated in the U.S.

Sincerely,

Richard McDonald, Ph.D.
President & CEO

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5/11/2004