

# LAND O LAKES® Feed

January 27, 2003

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Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane---Room 1061  
Rockville, MD 20852

Land O'Lakes Farmland Feed and Purina Mills LLC wish to submit the following comments in response to Docket No. 02N-0273 (Substances Prohibited From Use in Animal Food or Feed; Animal Proteins Prohibited in Ruminant Feeds) as part of 21 CFR 589. In the Advance Notice of Proposed Rulemaking, FDA is soliciting comments on potential changes, specifically five aspects related to measures being considered, to prevent the spread through animal feed of the agent of bovine spongiform encephalopathy (BSE), were it to enter the United States.

Land O'Lakes Farmland Feed LLC operates over 80 feed manufacturing plants that manufacture both the Land O'Lakes and Purina feed brands in 28 states and the province of Ontario, Canada. In addition, branded Land O'Lakes feed products are manufactured at over 170 locally owned cooperatives in North America. Our company is also a leading marketer of pet food and speciality animal feed.

Our company supports the efforts of the Food and Drug Administration and has worked diligently to educate our employees and customers on the importance of the BSE regulations and has continually strived to be in compliance with this key regulation.

We appreciate the opportunity to respond.

**In regards to Use of Pet Food in Ruminant Feed and the issue of whether or not pet food labeled for retail sale should be labeled with the statement, "Do Not Feed To Cattle Or Other Ruminants":**

Land O'Lakes Farmland Feed LLC operates several pet food manufacturing plants and distributes pet food products under multiple brands. We firmly believe that substantial negative sales and marketing impacts would be realized by requiring this statement on pet foods labeled for retail sale. A recent survey completed by the Pet Food Institute shows that consumers would be less likely to buy pet food products with this labeling statement on the packaging or labeling. We do not support nor do we believe the inclusion of this statement on pet food labels sold at the retail level is necessary to improve compliance with the BSE Rule. We do agree that salvage or distressed pet food does pose a risk of being used or fed in a manner that may pose a risk to ruminant animals. Our company along with

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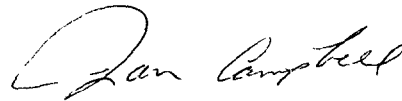
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many others have worked diligently over the last year to educate our employees and customers on proper handling of salvage and distressed pet foods. We have stressed that these products must be properly labeled when donated or sold as salvage or distressed product and believe that the efforts of the Pet Food Institute and other Trade Associations to educate and inform feed manufacturers and distributors has been quite successful in addressing this issue.

The risk associated with causing pet food owners to be unnecessarily concerned about the safety of our present pet products for their animals is very real, and the consequences enormous in the future safe and economic use of a by-product far out weigh any benefits to be derived from this proposal

Land O'Lakes Farmland Feed LLC appreciates the opportunity to share our views on this important feed regulation. We have worked diligently to inform our employees and customers of this rule's requirements and pledge to continue to do all we can to prevent BSE from threatening our nations feed supply. We would like to commend FDA for its scientific view of this important issue and urge that they continue to foster open dialogue regarding this rule as it is evaluated and potentially improved for effectiveness.

Thank you for the opportunity to comment.



Jan Campbell  
Manager, Regulatory Services