



## CENTRAL BI-PRODUCTS

590 West Park Road  
P.O. Box 319  
Redwood Falls, Minnesota 56283-0319

Phone: 507-637-2938  
Fax: 507-637-5409  
www.centralbi.com

January 30, 2003

Dockets Management Branch  
Food and Drug Administration  
5630 Fishers Lane  
Room 1061  
Rockville, MD 20852

Re: Docket No. 02N-0273

Dear Sir or Madam:

Central Bi-Products is a full service rendering company located in Minnesota. We provide a dead animal removal service for farmers and ranchers in Minnesota, South Dakota and North Dakota. Annually we render in excess of 75,000,000 pounds of dead animals. In addition to this, 350,000,000 pounds of cow and beef slaughter by-products are rendered.

If the brain and spinal cord were to be excluded from rendered animal products, the cost to pick up dead beef animals and then remove the excluded material prior to rendering would far exceed any values in the remaining raw material. This would most certainly cause Central Bi-Products to discontinue our dead animal removal service. The farmers would then be forced to find other methods of disposal or simply drag the animals to a remote location and allow the animal to decompose creating additional disease and pollution concerns.

The FDA has implemented feed restrictions and firewalls to prevent BSE in the United States. Further, there has never been a case of BSE in the U.S. I don't believe it is necessary to add additional rules that will cause great economic harm to the dairy, cattle and rendering industry. Implementation of Docket No. 02N-0273 would be unnecessarily punitive to the agricultural base for a disease that has not been diagnosed in any North American native cattle.

We believe that the Hazard Analysis Critical Control Points Program in concert with third party certification is sufficient. Intensive compliance to procedures through the American Protein Producers Industry and Facility Certification Institute has resulted in compliance to the prohibited proteins regulation.

We believe we have been diligent in carrying out our responsibilities to prevent BSE and respectfully request that Docket No. 02N-0273 not be enacted.

Thank you for the opportunity to provide this input.

Sincerely,

02N-0273

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Don W. Davis  
President

**Division of Farmers Union Marketing & Processing Association**