



KANSAS FARM BUREAU. . . The Voice of Agriculture
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Office of the President

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May 3, 2004

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

Re: Docket Number 03-025IF, Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle.

Kansas Farm Bureau represents roughly 23,000 cattle operations in the state of Kansas and as a state, we rank second in the nation for both cattle on feed, and the number of cattle processed annually. Cattle represent a key component of our state's economy and a healthy cattle industry is vital to our members. As an organization, at both the state and national levels, we strongly support science-based efforts to prevent Bovine Spongiform Encephalopathy (BSE) in the United States. For these reasons, we heartily commend your efforts to date and thank you for providing the opportunity to comment on these interim final rules.

Overall, we agree with the expanded list of items designated as specified risk materials (SRM's) and the Agency's declaration that they are inedible and prohibited for use as human food. Clearly, research both in the United States and abroad suggest that these items are of high risk and the new rules will protect the American public from potentially being exposed to the BSE agent.

We are concerned though, with the methods that inspection program personnel will use to determine the age of cattle processed. Because of the discounts being encountered for cattle over thirty months relative to cattle less than thirty months of age, this is a very important determination. The age of cattle when one of the second set of permanent incisors has erupted can vary considerably depending on several factors, including breed and diet. As a result, we strongly suggest that inspection program personnel rely more heavily on producer documentation. Unfortunately, most producers will likely not have "birth certificates" or "cattle passports." Because of this, we ask that USDA provide more clarity as to what kinds of records are acceptable for determining age and suggest that herd calving record books be included as acceptable evidence.

In regard to "non-ambulatory disabled livestock," we agree that these cattle represent a higher risk population and that additional safeguards should be implemented, but we question the wholesale condemnation of all carcasses from these cattle. As you're well aware, infectivity has never been demonstrated in the muscle tissue of cattle experimentally or naturally infected with BSE at any stage of the disease. We suggest

that USDA-FSIS re-examine this issue and consider possible exceptions or hold and test procedures for non-ambulatory cattle that are either under thirty months of age, or are intended for home-consumption only.

Likewise, we offer a concern regarding the carcasses from cattle processed on an emergency basis without ante-mortem inspection. We suggest that USDA-FSIS re-examine this issue and consider possible exceptions or hold and test procedures for cattle processed on an emergency basis that are either under thirty months of age, or are intended for home-consumption only.

Again, we thank you for the opportunity to forward our comments and look forward to working with the Department to establish workable rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Baccus", written in a cursive style.

Steve Baccus
President
Kansas Farm Bureau