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October 28, 2005

Docket Clerk, Docket No. 05-024N  
U.S. Department of Agriculture  
Food Safety and Inspection Service  
300 12<sup>th</sup> Street, SW  
Room 102 Cotton Annex  
Washington, DC 20250

**RE: Docket No. 03-025IFA  
Prohibition of the Use of Specified Risk Materials for Human Food and  
Requirements for the Disposition of Non-Ambulatory Disabled Cattle**

The American Association of Meat Processors (AAMP) is pleased to submit the following comments on the Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle Final Rule.

The Association is an international organization whose members include meat and poultry processors, slaughterers, caterers, home food service companies, wholesalers, retailers, suppliers, and consultants to the meat and poultry industry. There are 33 state, regional, and provincial associations of meat processors that are also affiliated with AAMP. Majority of our members are small and very small businesses, most of them family-owned and operated.

AAMP agrees with the amendment to permit beef small intestine, excluding the distal ileum, to be used for human food, provided that such product is derived from cattle that were slaughtered in an official establishment in the U.S. or in a certified foreign establishment from a foreign country that is eligible to export beef products to the U.S. It is a relief to know that FSIS is taking action based on the comments received on this issue and the Agency's evaluation of the supporting science. Scientific documentation related to the safe removal of the distal ileum from the remainder of the small intestine was readily available and AAMP appreciates the use of scientific information to publish regulations, which is in line with a scientific based inspection system.

Our membership was mainly affected by inability to use the natural casings with the previous regulation, and this new rule will again allow processors to utilize the beef small intestine, excluding the distal ileum, for casings. This will relieve some of the economic burden imposed on small and very small processors by the prohibition. It is important that both FSIS and FDA continue to monitor their respective areas related to the beef small intestine amendment to ensure establishments are following proper procedures and adhering to the rule. Allowing the

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beef small intestine, minus the distal ileum, will not affect the risk of BSE for humans, and it is critical that FSIS and FDA make scientific facts related to this rule clear to consumers.

AAMP appreciates the chance to comment on the Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle Final Rule. We hope that FSIS will continue to evaluate regulations by analyzing comments submitted by industry stakeholders. This amendment to the original rule is supported by sound science, and the American Association of Meat Processors supports the use of beef small intestine, excluding the distal ileum, for use in human food.

Sincerely,



Andrea H. Brown  
Director of Legislative and Regulatory Affairs

cc: Mark Schad, AAMP President