

RECEIVED
FSIS DOCKET ROOM

5

National Pork Board 04 APR -2 AM 9:43

P.O. Box 9114 Des Moines, Iowa 50306 USA Phone: 515-223-2600 Fax: 515-223-2646

FSIS Docket Clerk
Food Safety and Inspection Service
United States Department of Agriculture
Room 102, Cotton Annex
300 12th Street SW
Washington, DC 20250-3700

March 23, 2004

RE: Advanced Meat Recovery, Interim Final Rule, FSIS Docket No. 03-0381F,
69 Federal Register Pages 1874-1885, January 12, 2004

The National Pork Board is pleased to have this opportunity to comment on the Advanced Meat Recovery, Interim Final Rule. The National Pork Board is funded through the Pork Checkoff and represents over 80,000 pork producers in the United States. During 2001 nearly 19 billion pounds of pork were processed from approximately 97 million hogs. Annual farm sales typically exceed \$11 billion, while the retail value of pork sold to consumers reaches \$38 billion per year. The pork industry in the United States generates over \$72 billion in total domestic economic activity. Additionally, the pork industry supports over 800,000 jobs and adds over \$27 billion of value to basic production inputs such as corn and soybeans. Pork producers in the United States produce over 10% of the world's hogs, and the United States is the second leading exporter of pork in the world.

The pork industry views food safety as a farm to fork continuum. The Checkoff's pork safety objectives include:

- To assure the safety of U.S. Pork through coordinated science-based efforts throughout the pork chain.
- To ensure that producer interests are represented in food safety discussions.
- To improve product image domestically and internationally through communication of food safety practices.

The Interim Final Rule, FSIS Docket No. 03-0381F is to prohibit the infective materials of Bovine Spongiform Encephalopathy (BSE)-infected animals from entering both the human food and animal feed chain. The scientific evidence presented below would suggest that the inclusion of pork products in a ban on specific Advanced Meat Recovery processes is not supported by science.

Research conducted in Great Britain demonstrated that swine are resistant to BSE following oral exposure with large doses of infective material.¹ In addition, no case of naturally acquired Transmissible Spongiform Encephalopathies (TSE) has ever been demonstrated in swine.² The research is further strengthened by the fact that even at the height of the epidemic in cattle in the U.K. swine were not infected in spite of being exposed to the same feedstuff risk ingredients as the cattle.

In addition, the Harvard Risk Assessment³, a document used by USDA to support the scientific basis for the statements the Department has made about the public health risk from the individual case of BSE, also indicated that there was no demonstrated transmission risk from pork. **By extending the restrictions on Advanced Meat Recovery to cover pork products, the agency may run the risk of weakening the scientific credibility of the Harvard Risk Assessment.**

FSIS has requested comments specifically on whether the agency has chosen measures that are most appropriate for preventing human exposure to the BSE agent in the United States. The National Pork Board appreciates the mission of FSIS to protect human health, especially following the diagnosis of BSE in a cow in the United States. The agency is fulfilling its responsibilities to protect public health by identifying Specified Risk Materials from cattle and declaring these materials inedible and not usable for human food. However, the scientific evidence regarding the risk of pork as a vehicle for the transmission of BSE does not support extending the changes to the Advanced Meat Recovery process to include pork products.

Submitted by:



Liz Wagstrom, DVM, MS, DACVPM
Director, Veterinary Science

¹ Wells GA, Hawkins SAC, Austin AR, et al. 2003. Studies of the transmissibility of the agent of bovine spongiform encephalopathy to pigs. *Journal of General Virology*, 84, pp. 1021-1031.

² MAFF. 2000. MAFF BSE Information, <http://www.maff.gov.uk/animalh/bse/index.html>.

³ <http://www.aphis.usda.gov/lpa/issues/bse/bse-riskassmt.html>