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Dog Food Bi-Products

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August 9, 2004

04-021ANPR
04-021ANPR-16
Jake Jacobsen

Public comment on the FDA's proposed ban on beef bi-products from dead stock and rendering industries going into pet foods and other feed stuffs; FSIS Docket # 04-021ANPR.

A prohibition on beef bi-products being formulated into pet foods and non-ruminant feed stuffs would produce devastating effects on Wisconsin's farm economy. It would also wreak havoc on taxpayers' pocketbooks, as well as produce a vexing human health and ecological problem for all of society that most likely won't be solved. In addition, we believe this action would serve to kill much of the effectiveness of the existing BSE testing program and ensuing policy that may spin off of current government policy. Also, if implemented, it would wipe out approximately 600 jobs associated with Karem's owner - the Merrick family.

First and foremost, today's dead stock and rendering industries are the logical outcome of solving very precarious ecological and human health problems. We at Karem and others recycle dead cows and their calves. The product of this recycling is sold to makers of dog food and the hides produce shoes and clothing. Our scrap produced in this process goes into the

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rendering industry.

Without our service to the cattle and dairy industry and society, dead cows in Wisconsin would vie for a count on the human census. We are a dairy state, proud of it and confident that our dead stock and rendering industries have historically provided a very valuable service to all concerned, farmers and non-farmers alike.

Dairy farms in many of our state's localities abut non-farm residences and businesses. The peaceful co-existence between farm and non-farm which has developed over the years comes from mutual respect that in very large measure includes the timely removal of dead and down animals from our farms. We provide this service, and, in turn, supply the pet food industry and rendering operations with a reliable and government-regulated source of protein and other products. In short, because we recycle cows, we ultimately help the dairy farmer add to his or her bottom line and we also provide a very real solution to what could be a devastating human health problem.

Without this recycling service on the part of the dead stock and rendering industries, Wisconsin dairy farmers and non farmers alike would be saddled with the disposal of hundreds of thousands of dead animals on an annual basis. Should the private sector have no economic incentive to pick up

and process dead and down cattle for bi-products, our state's landscape will be befouled by a multitude of dead cows and calves in stream and creek beds and across our woodlands.

This very real scenario would be a boon to our fast-growing coyote population. Ironically, it would also serve to divert the attention of the many hunting dogs who take to the fields and woods each fall with their human hunting companions. Year around, the daily prospect of many thousands of rotting cows on our landscape would strain the good working relationship our state's farmers have with non farmers. It would also strain the relationship that our packing industry has with its neighbors.

Some in the scientific arena have suggested incineration as a means of disposal. We make note of the fact that Wisconsin attempted to incinerate its CWD (chronic wasting disease) deer. The cost to the taxpayer for the incineration alone was \$70 per animal, according to State Representative David Ward. This cost did not reflect the expense of picking up and transporting the animal. The entire expense was borne by taxpayers.

Simple observation reveals that a cow's body mass and weight are four to six times that of a deer. We also make note of the fact that Holland attempted to incinerate its dead stock. After approximately a year's time, this

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method of disposal was dropped due to cost and practicality. The dead stock and rendering industries were allowed to resume their valued service to farmers and the rest of society.

We would like to point out that the only current cost to state and federal governments for the dead stock and rendering industries are those generated by thoughtful regulation. Should the FDA proposal become law, governmental bodies outside of the FDA will have to intercede in very large measures to prevent the serious human health and environmental problems which will ensue. The cost to the farmer and the taxpayer will be enormous. It is our position that a government that removes proved efficiency in problem solving from the private sector can only be a burden on the well being of all of those it serves.

We contend that the marketplace which is in existence to solve this problem for the whole of society is the most effective means by which the taxpayers of this country can be saved money. If you look at figures supplied by Garth Merrick (see attachment), it's not unreasonable to project that our country is looking at the enormous challenge of annually disposing of billions of pounds of cattle. We repeat that the marketplace created by the dead stock and rendering industries has built a safe and efficient means by which society

can be relieved of a vexing problem.

If you will allow us some latitude, let's look at the \$70 cost to dispose of a CWD deer carcass by means of incineration. This deer weighs an average of 180 pounds. This translates into a \$1 cost to dispose of 2.57 pounds of deer carcass. Keep in mind this cost does not take into account transportation expenses - vehicle, fuel, labor. An average dairy cow in the dead stock business that will be BSE sampled weighs around 1,200 pounds. This means that incineration cost alone for this cow would be just more than \$466.

If you multiply this by the approximately 10,000 animals per month that are disposed of by Wisconsin's dead stock and rendering industries, the figure is a staggering \$4.66 million per month that units of government in Wisconsin alone must absorb.

Using the figures supplied by Merrick for the Texas, New Mexico, Oklahoma and Kansas areas that concern SRM material targeted by the FDA, taxpayers are looking at an astronomical incineration-only annual cost of nearly \$117 million. Ladies and gentlemen, these figures are only preliminary, but they are not unrealistic and they represent only two areas of operation in the vastness of the U.S. cattle business.

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We would also point to the very real fact that the U.S. supply of natural gas is fast becoming tighter. We in the upper Midwest have been subject to large natural price increases to winter-heat our homes in the past several years.

Incinerating our dead cows will undoubtedly lead to a further tightening of our gas supply and force price hikes.

The big question for you, should you decide to implement the FDA's proposed rule, is who is going to pay the tab - the cattle or dairyman, the packing plants, the American taxpayer? If it's private industry, this cost will be passed on in the price of beef. And, no matter what, those of us who heat our homes with natural gas will also pay.

At the same time, the current state of BSE testing in the United States relies greatly on the dead stock industry for efficiency and practicality in accomplishing the goal set by the federal government. Cattle in the suspect age group (30 months of age or older) off farms and USDA/FSIS-condemned animals from packing plants are collected by the dead stock industry. At these central locations, USDA/APHIS VS personnel collect brain stem tissue samples for BSE testing. Without the existence of the dead stock and rendering industries, there would be no central locations where multiple tissue samples could be

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efficiently and economically collected. Instead, APHIS personnel would be faced with the daunting task of going from farm to farm in search of animals in the qualifying age group, convincing producers that these animals should be shot on sight, have their heads removed for sample collection and then the carcass, head and offal be saved until the results of the test were available. After convincing the farmer of this necessity, he or she would then have to agree to store the animal in a refrigerated, secure spot for 24-48 hours. Or the farmer might just bury it or toss the animal into a stream bed.

In fact, this farm-to-farm method is how APHIS VS is collecting samples in the state of Mississippi due to the lack of a dead stock industry. It would be common sense to check the number of samples collected to date in Wisconsin with the number collected in Mississippi.

Given the approximately 275,000 animals that are the goal of the current testing program, it could be decades before these numbers are realized, should the dead stock and rendering industries be repudiated by FDA regulations. The effectiveness and efficiency of the current testing program would be wiped out at great cost to taxpayers, not to mention that the proposed FDA action would set back the timetable for discovering whether or not we truly do have USA-born BSE animals in the nation's cattle herd. This

would play heavily to the negative with our current federal government policy of convincing foreign trading partners that we are serious about BSE testing.

For FSIS condemned animals, the sampling would have to be done on site at packing plants. This is something that we would hope the federal government's policy makers would be loathe to do. Should a BSE-positive animal be discovered inside a federally inspected packing plant, this would have a far greater negative impact on U.S. consumer confidence and that of our foreign trading partners than if the animal were discovered via sampling at a dead stock plant.

We have set a course to discover if we have a USA bred, born and raised animal afflicted with BSE. Common sense tells us to stick the course with this policy in order to assure U.S. consumers and the world that we are responding to their concerns.

Often, speculative science comes into conflict with the real world. We would hope that our policy makers, who have to decide this question, carefully consider the very real human health concerns generated by millions of dead cattle on our landscape and the possibility that we might have a BSE-infected cow which has not yet been discovered.

We propose that logic in this matter would keep in place our current

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rules for formulations of pet foods and livestock feedstuffs. We would also hope that speculative science does not override common sense and sound government policy already in place to ensure beef safety and affordable beef supplies for the American public.

A decision for the FDA's proposed rule change will wreak havoc on existing industries that have used initiative to solve very serious human health and ecological concerns. It will also unduly burden cattle and dairy farmers, the packing industry and the American taxpayer with a costly bill that in the experience of at least one country, Holland, won't get the job done.

The FDA's proposal will also seriously jeopardize the efforts already put forth in support of our trade representatives to quickly have the scientific backing for convincing our trading partners that USA beef is BSE safe. This rule will kill the dead stock and rendering industries, and, in turn, it will severely hamper APHIS VS' ability to gather the needed tissue samples in its effort to carry out U.S. Government policy.

We call upon our elected and appointed representatives in government to reject this FDA-proposed rule change.
Sincerely,

Jake Jacobsen,
Karem, Inc.