



MISSISSIPPI FARM BUREAU FEDERATION

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January 16, 2003

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: **Docket No. 02N-0273**

Dear Food and Drug Administration:

The Mississippi Farm Bureau Federation (MFBF), the state's largest general farm organization with over 219,000 member families, appreciates the opportunity to provide comments to the Food and Drug Administration (FDA) regarding the November 6, 2002, proposals prohibiting certain substances from being used in ruminant feed. We would like to address *Federal Register* announcement issue No. 2: "Use of Poultry Litter in Cattle Feed."

Mississippi State University Extension Service personnel have indicated that poultry litter is used as a cattle feed in most poultry growing regions of the state. However, the extent of feeding litter is unknown since the feeding of litter is influenced by feed grain costs and supply and weather conditions as it relates to hay and forage production. Beef producers need to preserve the option of feeding poultry litter to cattle.

We are concerned that should FDA ban the feeding of poultry litter to livestock, then federal regulators may ban the application of poultry litter to pastures using the health risks reasoning promulgated by the FDA. Poultry litter is an excellent soil amendment and the loss of its use as such would cause financial impacts to poultry producers who are also involved in beef cattle production.

FDA indicates that it is seeking information on the level of poultry feed spillage in poultry litter. Extension Service personnel indicate that feed spillage is very low due to new feed system technologies that deliver specified amounts of feed to the birds. Feed costs constitute 50-75% of poultry production costs. Obtaining positive feed conversion ratios is very important for profitability. Also, if there is spillage, the birds do a good job of picking the feed off of the ground during normal pecking and scratching activities. Therefore, feed spillage should not be a major problem or concern in litter composition.

So as to continue the use of litter as a dietary supplement for cattle and as a soil amendment for pastures, we support the banning of ruminant material in poultry feeds. By banning prohibited materials in poultry feed, the risk of poultry litter containing prohibited materials will be totally eliminated. We know of poultry integrators in certain areas of the country that use ruminant protein in feeds due to the proximity of major beef

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processing plants and the low costs of obtaining ruminant protein. However, to our knowledge, on one in Mississippi is using ruminant protein in poultry feed.

Again, the MFBF appreciates the opportunity to provide comments on this important issue. Should you have any questions regarding these comments, please contact me at 601-977-4248.

Sincerely,

A handwritten signature in black ink that reads "Brent Bailey". The signature is written in a cursive, flowing style.

Brent Bailey
Director, Natural and Environmental Resources