

World Renderers Organization

801 North Fairfax Street, Suite 20701 NOV 20 25 2001
Alexandria, Virginia 22314

November 12, 2001

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

RE: Docket No. 01N-0423

Dear Sir or Madam:

The World Renderers Organization (WRO), which represents 17 countries around the world including the United States, would like to comment on Docket No. OIN-0423, "Substances Prohibited From USC in Animal Food or Feed; Animal Proteins Prohibited in Ruminant Feed" as published in the Federal Register, October 5, 2001 (Volume 66, Number 194).

The World Renderers Organization supports the position of the North American Rendering Industry that there are sufficient regulations in place to protect the safety of animal feeds and public health in the U.S. At this time there is no need to reopen the 1997 rule.

The firewalls of safety that have been put in place, i.e., the ban on imports since 1989, the continued surveillance program exceeding OIE recommendations, the feed ban of 1997 and certification programs have accomplished the goals they were intended to.

The WRO supports all efforts to produce safe feed and food. We would support any necessary changes in regulations to that end, but cannot agree to arbitrary attempts to satisfy public perception.

Different circumstances around the world require different levels of controls. What may be appropriate in one part of the world should not dictate or influence decisions in third countries. Risk assessment should be the determining factor and, only if that risk changes, should further controls be necessary. Politics and perception have no place in determining policy.

Thank you for the opportunity to comment.

Sincerely yours,



Doug Ward
President
World Renderers Organization

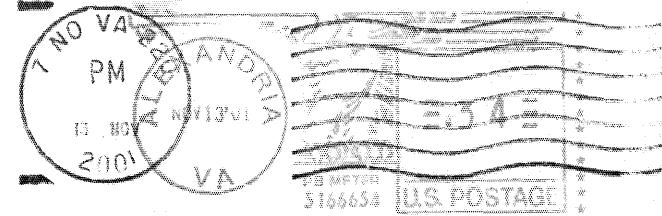


Michael J Langenhorst
Immediate Past President
World Renderers Organization

01N-0423

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