

TAB 52



NATIONAL CHICKEN COUNCIL

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November 6, 2001

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

Re: Docket No. OIN-0423 21CFR Part 589—Substances Prohibited from Use
in Animal Food or Feed; Animal Proteins Prohibited in Ruminant Feed;
Public Hearing; Request for Comments

The National Chicken Council (NCC) is the national trade association representing the vertically integrated young meat chicken industry. NCC member companies produce, process and market over 90 percent of the chickens in the United States.

NCC was represented by staff and technical/management personnel at the public hearing referenced above on October 30, 2001. These written comments represent the input from the National Chicken Council and may be supplemental with input from individual member companies.

The young meat chicken industry is an important part of the economy in the United States and abroad. Not only does the industry provide employment for tens of thousands of people, it also is the largest source of animal meat protein in the diets of U.S. consumers. This year more than 8.4 billion young meat chickens weighing over 42.5 billion pounds, liveweight, will be produced. This production will have an economic value, measured in terms of value-of-shipments from processing plants, in excess of \$27.5 billion. In addition, the young meat chicken industry is an integral part of other agricultural enterprises such as corn, soybean, and beef enterprises. Many products flow back and forth among these and other enterprises, including animal by-products processed and utilized as feed ingredient.

Obviously any factors or issues that may impact the viability of our industry are of grave concern to us. It is out of this concern, and because our industry uses animal by-products from both ruminant and non-ruminant sources for growing chickens and parent stock that we have studied the BSE situation closely. Based on our current knowledge of this issue we recommend the following:

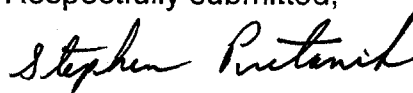
- ◆ Keep the current regulation CFT 589-2000, dated June 5, 1997, for the foreseeable future without any revision. There is no significant new research or field data to support a revision of this rule at this time.

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- ◆ FDA should make every effort to fully enforce the current rule especially as applied to the import of animals and animal by-products. Many who testified at the October 30, 2001 hearing on this issue called for no changes in regulations, but tighter enforcement of the existing rule.
- ◆ That additional research be undertaken to put in place needed scientific data to better understand BSE and related animal/human diseases. Field data from the European continent is helpful, but is not complete enough to meet our need in the United States for basic epidemiological data.
- ◆ Work closely with USDA on current risk management studies to chart effective responses to BSE and related diseases, should such occur in the U.S.
- ◆ Finally, FDA, USDA and related agencies who have worked together to prevent BSE from entering the United States should be applauded for their success under current regulations, and we should all be reminded that the “firewalls” under current regulations have worked successfully. We have had no documented case(s) of BSE in the U.S. today. No changes in regulations are needed at this time.

Respectfully submitted,



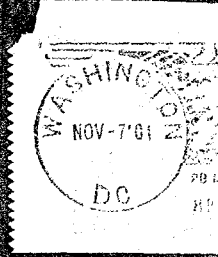
Stephen Pretanik
Director of Science and Technology

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First Class



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