U.S. Poultry & Egg
ASSOCIATION

1530 Cooledge Road
Tucker, GA 30084-7303, USA
Telephone: 770/493-9401
Facsimile: 770/493-9257
www.poultryegg.org

October 23, 2001

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

Reference: Docket No. OIN-042333

A major concern of this association is that new regulations might be implemented along the lines of the European community that would restrict the uses of rendered poultry products as ingredients in poultry feed, other animal feed or pet food.

There is no basis in science to pursue such a course. We have previously expressed our concern to Dr. Sundlof, Director of the CVM/FDA and received a reply from Dr. George Graber, Director of Animal Feeds, CVM/FDA stating that none of the current options for possible emergency rule-making on the feeding of rendered animal products to poultry or other farm animals, should BSE be found in the United States, would restrict the use of rendered poultry products for use in animal feed. Copies of this correspondence are attached.

Because there is no scientific basis for the exclusion of rendered poultry products from any animal feed because of BSE, we urge that such restrictions not be considered, regardless of the policies adopted in Europe. Such a prohibition would have a significant negative economic impact on the poultry industry.

Thank you for the opportunity to submit comments as part of the public hearing on substances prohibited from use in animal food or feed; animal proteins prohibited in ruminant feed.

Sincerely,

Charles W. Beard, D.V.M., Ph.D.
Vice President – Research and Technical Programs

cbeard@poultryegg.org

CWB/eh

Attachments (2)

OIN-0423

CH8

COPY

May 31, 2001

U.S. Poultry & Egg
ASSOCIATION

1530 Cooledge Road
ucker, GA 30084-7303, U.S.A.
Telephone: 770/493-9401
Facsimile: 770/493-9257
www.poultryegg.org

Dr. S. F. Sundlof, Director
Center for Veterinary Medicine
Food and Drug Administration
7500 Standish Place
Rockville, MD 20855

Dear Dr. Sundlof:

We have been told by an individual in a leadership position in the rendering industry that there is an unwritten, negotiated government plan of action in place related to the use of rendered animal products should there be a case of BSE in the U.S. The plan is reported to be along the lines of the European action which will prohibit the feeding of any and all rendered animal products back to food animals, including poultry. Since the CVM/FDA has the responsibility for the feed regulations, I am directing this inquiry to your office.

The rationale for such a non-science based plan is that it would be impossible for regulatory agencies to assure that ruminant byproducts were not being fed to food animals unless all animal byproducts were prohibited as a feed ingredient.

The Board of Directors of the U.S. Poultry & Egg Association meets in early June and I have been asked to report to them on this issue. Therefore, it would be very helpful if you could provide some clarification on the impact, if any, of a case of BSE in the U.S. on the use of rendered poultry products, especially as an ingredient in poultry feed, other animal feed or pet food. As you know, most large poultry integrators have their own rendering plants and render nothing but their own poultry processing offal. It would not be difficult to track their product from the rendering plant to their poultry-dedicated feed mill or to other approved uses such as pet food.

Hopefully that initial BSE case won't occur, but since rendering is such a critical part of poultry processing, we need to know if and how the poultry industry will be impacted.

Sincerely,

Charles W. Beard, D.V.M., Ph.D.
Vice President, Research & Technology
cbeard@poultryegg.org

CWB:eh

JUL 5 2001

DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville MD 20857

Dr. Charles W. Beard
Vice President, Research and Technology
U.S. Poultry and Egg Association
1530 Cooledge Road
Tucker, Georgia 30084-7303

Dear Dr. Beard:

This letter is in response to your May 31, 2001 inquiry to Dr. Sundlof about an FDA plan to prohibit feeding rendered animal products to poultry and other farm animals if BSE is found in the United States. The FDA does not normally use an unwritten, negotiated type of plan that you describe. You may be referring to CVM's BSE Contingency Plan. This plan primarily deals with emergency communications, but also contains three suggested options for possible emergency rulemaking in the event that BSE is found in the U.S. None of the three suggested options in the plan would restrict the use of rendered poultry products for use in animal feed. A decision on which if any of these options would be most appropriate would likely not be made until an emergency rule is needed.

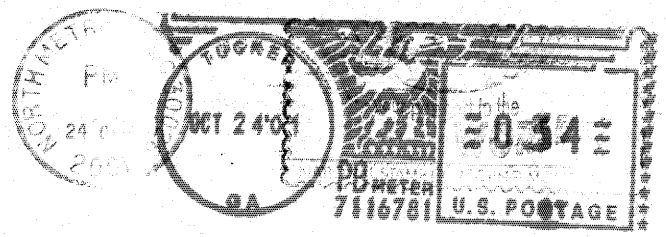
FDA is also reviewing the current feed ban to determine if changes are needed to strengthen its protection of U.S. livestock from the threat of BSE. At this time no decisions have been made on whether changes to the regulation are warranted.

If you have any questions concerning this letter, please contact Dr. Burt Pritchett. He can be reached by telephone at (301) 827-0177.

Sincerely,

George Graber, Ph.D.
Director
Division of Animal Feeds
Center for Veterinary Medicine

U.S. Poultry & Egg
ASSOCIATION
1530 Cooledge Road
Tucker, GA 30084-7303
www.poultryegg.org



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

20857+0001