



MISSISSIPPI FARM BUREAU FEDERATION

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January 2, 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) believes that the government should provide only minimal control and aids. However, we also believe that a safe and abundant food supply is crucial to the health and security of our nation. Therefore, the 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 proposals prohibiting certain substances from being used in ruminant feed. We understand that FDA is investigating ways to strengthen existing animal feed regulations to further reduce the risk of BSE entering the United States and our food chain.

We will respond to the five possible regulatory modifications as they are listed in the Federal Register notice.

1. Excluding Brain and Spinal Cord from Rendered Animal Products

By totally excluding brain and spinal cord from rendered animal products, an additional waste stream with no value will be created - with the costs of disposal ultimately being passed down to the consumer or subtracted from the price paid to the cattle producer. The increases in the level and magnitude of testing for BSE and related diseases has been dramatic since the attacks of Sept. 11, 2001 and the outbreak of BSE and FMD in Europe, particularly the United Kingdom. Our food supply was the safest in the world prior to those events and the focus on food safety has increased significantly since.

Should USDA determine that certain high-risk tissues such as those mentioned above be banned from use in human food, we will accept that decision. However, the total exclusion of high-risk tissues or specified risk materials from rendered materials is not necessary. While we support a ban of any animals proteins scientifically shown to transmit BSE from being included in ruminant feeds, we feel that these materials can be used in pet foods or other zoological foods without adding BSE exposure risks to humans or domestic livestock.

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2. Use of Poultry Litter in Cattle Feed

The poultry industry is Mississippi's number one income producer at the farm gate. Mississippi ranks 4th in the nation in poultry production. The production of poultry, of course, leads to the production of poultry litter.

Poultry litter has long been recognized as a valuable fertilizer for pasture and forage production. However, producers have also recognized alternative uses for litter. One such use is as a dietary nutrient in cattle feed. Numerous producers combine their poultry operations with stocker cow or brood cow operations so as to take advantage of the limited nutrient value in litter. MFBF understands the concerns that FDA may have regarding the use of poultry litter as a feedstuff. So as to continue the use of litter as a dietary supplement for cattle, we support the banning of ruminant material in poultry feeds. By banning prohibited materials in poultry feed, the poultry litter will not have the prohibited materials in it and then can be fed to ruminants, such as cattle.

Producers who feed poultry litter to cattle are urged to follow recommended deep-stacking procedures to allow the material to go through a heat. Also, the use of poultry litter as a pasture fertilizer should pose no problems relative to BSE concerns. Currently, FDA opinion is that poultry litter can be fed to livestock since there is no evidence the agent that causes BSE would survive passage through the chicken intestinal tract.

The Extension Service of Mississippi State University has developed a publication that outlines the nutritional value of poultry litter, what affects the composition and quality of litter, how best to process and store litter prior to feeding, and what are the recommended rations. The publication has been attached for your reference and information.

3. Use of Pet Food in Ruminant Feed

The MFBF supports whatever steps necessary to require feeds sold within the state to be labeled, including specific ingredients contained in the feed. We do not feel that a significant burden will be placed on feed and packaging processors should pet foods for retail sale be required to be labeled with the cautionary statement "Do not feed to cattle or other ruminants."

4. Preventing Cross-Contamination

Requiring separate, dedicated facilities for the processing of prohibited and non-prohibited substances in feed would definitely eliminate a large portion of the risk of cross-contamination. However, the requirement could be costly to some feed manufacturers.

We recommend strict enforcement of current rules and regulations that require a plan and system to prevent cross-contamination events. Should widespread non-compliance with current rules be found, the dedicated facility requirement should be seriously considered.

5. Elimination of the Plate Waste Exemption

Mississippi has not allowed discarded human foods to be fed to hogs commercially since 1972. Only individuals who raise hogs for private household consumption are permitted to feed animal and vegetable wastes to their hogs. Also, the MS Dept. of Corrections is exempt from Mississippi's plate waste regulations. We are not aware of any information relating to the extent of plate waste used in feed for ruminants, commercially or privately.

As a matter of public and animal health, the MFBB would not oppose regulations that prohibit the feeding of plate wastes to commercially marketable ruminants.

Again, we appreciate the opportunity to provide comments on this important issue and we appreciate the efforts of the FDA to prevent the establishment and propagation of BSE and other diseases in the United States. Should you have any questions regarding these comments, please contact me at 601-977-4248.

Sincerely,

A handwritten signature in cursive script that reads "Brent Bailey". The signature is written in black ink and is positioned above the typed name and title.

Brent Bailey
NER Director