



AMERICAN FARM BUREAU FEDERATION®

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June 16, 2003

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

RE: Draft Guidance for Industry: Use of Material from Deer and Elk in Animal Feed; Availability (Docket No. 03D-0186).

Dear Sir or Madam:

The American Farm Bureau Federation (AFBF) appreciates this opportunity to comment upon this draft guidance document.

AFBF is very concerned about the possibility of transmissible spongiform encephalopathies (TSE) spreading in the U.S. The recent case of bovine spongiform encephalopathy (BSE) in Canada and the economic harm caused by the case, underscores why we support controlling all forms of TSE's.

AFBF policy supports a ban on the inclusion in ruminant feeds of any animal proteins scientifically shown to transmit BSE. Current FDA BSE feed regulations prohibit most material from deer and elk in ruminant feeds.

AFBF supports the position that only negatively tested rendered elk and deer is allowed to enter the feed supply chain. Deer and elk that have tested positive for CWD, or not tested at all for CWD, should not be allowed to enter the feed supply chain.

AFBF urges FDA to reconsider this proposal and to not expand the ban on using all deer and elk rendered products in all animal feeds.

We thank you for this opportunity to provide these comments.

Sincerely,

Richard W. Newpher
Executive Director
Public Policy

03D-0186

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