



MISSISSIPPI FARM BUREAU FEDERATION

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December 14, 2005

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

RE: Docket No. 2002N-0273; Substances Prohibited From Use in Animal Food or Feed; Proposed Rule

Dear Food and Drug Administration:

The Mississippi Farm Bureau Federation (MFBF) appreciates the opportunity to provide comments to the Food and Drug Administration (FDA) regarding the October 6, 2005 proposed rule to prohibit the use of certain cattle origin materials in the food or feed of all animals. We feel that the FDA has proposed a rule that will build upon the existing BSE firewalls that were adopted in 1989 and 1997. The removal of the additional high-risk materials identified in this proposed rule will further reduce the already low risk of BSE transmission.

By eliminating the materials classified as high-risk from all animal feeds, the proposed rule preserves the use of poultry litter in a ruminant feed ration. We agree with FDA that banning poultry litter from ruminant rations would have little or no affect on the human risk and could increase environmental risks due to the need for alternative disposal methods. However, FDA has asked for additional comments on the issue.

While most poultry litter is not used as cattle feed, Mississippi State University Extension Service personnel have indicated that poultry litter is used as a cattle feed in most poultry growing regions of the state. However, the extent of feeding litter is unknown since the feeding of litter is influenced by feed grain costs and supply, weather conditions as it relates to hay and forage production, and alternative use limitations. Beef producers need to preserve the option of feeding poultry litter to cattle.

MFBF was concerned that should FDA ban the feeding of poultry litter to livestock, then federal regulators could ban the application of poultry litter to pastures using any health risks reasoning promulgated by the FDA. Poultry litter is an excellent soil amendment and the loss of its use as such would cause financial impacts to poultry producers who are also involved in beef cattle production.

FDA was concerned about human health risks from any discernable level of poultry feed spillage in poultry litter. Extension Service personnel indicate that feed spillage is very low due to new feed system technologies that deliver specified amounts of feed to the birds. Feed costs constitute 50-75% of poultry production costs. Obtaining positive feed

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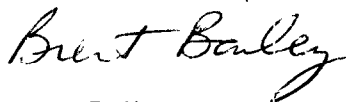
conversion ratios is very important for profitability. Also, if there is spillage, the birds do a good job of picking the feed off of the ground during normal pecking and scratching activities. Therefore, feed spillage should not be a major problem or concern in litter composition. In addition, FDA opinion is that there is no evidence the agent that causes BSE would survive passage through the chicken intestinal tract.

So as to continue the use of litter as a dietary supplement for cattle and as a soil amendment for pastures, we support the proposed rule to prohibit specified high-risk ruminant material in poultry feeds. By banning these prohibited materials in poultry feed, the risk of poultry litter containing prohibited materials should be totally eliminated. Therefore, a ban on poultry litter in ruminant feed is unwarranted.

The FDA has asked for comments on other topics associated with this proposed rule. Since we have very few members involved in the slaughtering, rendering, and animal feed processing industries, we focused comments on possible on-farm impacts related to the proposed rule. Issues related to compliance-based record keeping can best be addressed by the affected rendering industries.

Again, the MFBF appreciates the opportunity to respond to the proposed rule. We feel that the proposal considers and provides a balance of risks and benefits to the extent that a practical, cost-effective method of preventing BSE in U.S. cattle is put in place. 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".

Brent Bailey
Environmental Programs Coordinator