

## **AAMP Member Letter re Latest FDA, USDA Rulemaking on BSE**

To: Food and Drug Administration  
USDA Food Safety and Inspection Service  
USDA Animal & Plant Health Inspection Service  
Members of Congress (2 Senators and U.S. Representative)

As a small meat processor, I am writing to you to raise concerns about new rulemaking that is being considered by the Food and Drug Administration, and two Agencies within USDA: the Food Safety and Inspection Service, and the Animal and Plant Health Inspection Service, to prevent the occurrence of BSE ("mad cow disease") in the cattle herd in the United States.

I commend the federal government's continued vigilance in maintaining strong protections against BSE. The efforts by the government to achieve 100 percent compliance with existing feed restrictions are good, although FDA does report that feed restrictions right now are being complied with more than 99 percent of the time, the highest level of observance of any FDA rule.

But I am concerned about the proposal for mandatory elimination of Specified Risk Materials (SRMs) from all animal feed. With no "homegrown" BSE case found in the United States at all, this policy would be unnecessary and duplicative in view of other feed restrictions that exist right now.

This would result in a huge drop in markets for renderers, and would make it even more difficult for small and very small plants to have their materials picked up by renderers. While large packers generally have their own rendering operations, the small industry is dependent on independent rendering companies for service, especially the smaller rendering firms.

It is not going to pay independent renderers to send out to trucks to very small plants to pick up waste materials, especially if the renderers would require them to be separated into SRMs and non-SRMs.

The government, including the USDA and FDA, as well as Congress, needs to examine what is going to happen if these regulations are put into effect. These waste materials have to be disposed of in some way. It is not going to be helpful if this waste is dumped on fields, or on other locations. We urge the government to take another look at this issue, and reconsider. The steps are not necessary, and will hurt the small industry severely.

Sincerely,

(Go to [www.congress.org](http://www.congress.org) . You will find the names of your U.S. Representative and Senators, with ways to contact them via e-mail, regular mail and telephone.)