

UNITED STATES ANIMAL HEALTH ASSOCIATION - 2005

RESOLUTION: 38 APPROVED

SOURCE: COMMITTEE ON FOREIGN AND EMERGING ANIMAL DISEASES

SUBJECT MATTER: NATIONAL SPECIFIED RISK MATERIALS TASK GROUP

DATES: Hershey, Pennsylvania – November 3-9, 2005

BACKGROUND INFORMATION:

The Food and Drug Administration (FDA), Center for Veterinary Medicine (CVM) has proposed in the October 4, 2005, *Federal Register* additional safeguards to prevent the transmission of the agent of Bovine Spongiform Encephalopathy (BSE). The FDA-CVM proposal will prohibit certain high-risk materials from entering the animal feed supply, including the brains and spinal cords of cattle 30 months of age and older, brains and spinal cords of cattle of any age not inspected and passed for human consumption, and the entire carcass of cattle not inspected and passed for human consumption if the brains and spinal cords have not been removed. In addition, tallow that is derived from the above prohibited materials cannot contain greater than 0.15 percent insoluble impurities and all mechanically separated beef is prohibited if derived from the above prohibited materials.

While the ultimate economic impact of this proposal is uncertain at the present time, FDA-CVM has estimated that disposing of just the brains and spinal cords from cattle over 30 months of age would create approximately 64 million pounds of waste per year that renderers would have to burn or bury at an estimated cost of approximately \$14 million. Such disposal costs are expected to be passed back to the producer level in the form of discounted prices for market slaughter cows. In addition, the rendering industry will no longer have meat and bone meal outlets for 4-D animals when it is not feasible or economical to remove brains and spinal cords. Concern is being expressed that such an economic disincentive could lead to further discontinuance of on-farm, dead pick-up service in many parts of the nation.

In the face of this regulatory decision by the FDA-CVM, the United States Department of Agriculture (USDA), Animal and Plant Inspection Service (APHIS), Veterinary Services (VS) needs to take a leadership role in bringing all affected stakeholders together to develop a national Specified Risk Materials (SRM) utilization and disposal plan that minimize the economic impact upon cattle producers and the rendering industry while enhancing animal disease surveillance functions of both federal and state animal health authorities.

RESOLUTION:

The United States Animal Health Association (USAHA) urges the United States Department of Agriculture (USDA), Animal and Plant Inspection Services, (APHIS), Veterinary Services (VS) and Food Safety Inspection Service (FSIS) to create a National Specified Risk Materials (SRM) Disposal Task Group to develop a viable national plan with state and affected industry stakeholders to utilize and/or dispose of SRM's to be prohibited from entering the animal feed supply if the United States Department of Health and Human Services (USDHHS), Food and Drug Administration (FDA), Center for Veterinary Medicine (CVM) proposed rule of October 4, 2005, is adopted. The plan should:

- Minimize the potential economic impact upon cattle producers and the rendering industry

- Maintain economical, on-farm, dead stock recovery by the rendering industry and enhance animal disease surveillance by the USDA and the states
- Develop value-added markets for non-ambulatory and dead stock that cannot be utilized in the feed supply and develop safe utilization and disposal options that maximize public health and environmental concerns.

RESPONSE:

ANIMAL AND PLANT HEALTH INSPECTION SERVICE, VETERINARY SERVICES (APHIS-VS)

The Animal and Plant Health Inspection Service recognizes the potential implications of the proposed rule for additional safeguards against Bovine Spongiform Encephalopathy (BSE) transmission and supports the formation of a National Specified Risk Materials Task Group. The task groups should review the likely impacts of the rule as well as economically viable solutions to incentivize compliance with BSE control programs.