



National Milk Producers Federation

National Milk Producers Federation • 2101 Wilson Blvd., Arlington, VA 22201 • 703-243-6111; FAX 703-841-9328

Agri-Mark, Inc.
Arkansas Dairy Cooperative Association
Associated Milk Producers, Inc.
Continental Dairy Products, Inc.
Cooperative Milk Producers Assn.
Dairy Farmers of America, Inc.
Dairymen's Marketing Cooperative, Inc.
Dairylea Cooperative Inc.
Ellsworth Cooperative Creamery
Farmers Cooperative Creamery
First District Association
Foremost Farms USA
Humboldt Creamery
Just Jersey Cooperative, Inc.
Land O'Lakes, Inc.
Lone Star Milk Producers, Inc.
Manitowoc Milk Producers Coop.
MD & VA Milk Producers Cooperative Association, Inc.
Michigan Milk Producers Assn.
Mid-West Dairymen's Company
Northwest Dairy Association
Prairie Farms Dairy, Inc.
St. Albans Cooperative Creamery, Inc.
Scioto County Co-op Milk Producers' Assn.
Select Milk Producers, Inc.
Southeast Milk, Inc.
Swiss Valley Farms, Co.
Tillamook County Creamery Assn.
United Dairymen of Arizona
Upstate Niagara Cooperative, Inc.
Zia Milk Producers

Docket No. FSIS–2008–0022
Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
Room 2534, South Agriculture Building
1400 Independence Avenue, SW.
Washington, DC 20250

Re: Requirements for the Disposition of Cattle That Become Non-Ambulatory Disabled Following Ante-Mortem Inspection; Docket No. FSIS–2008–0022

September 29, 2008

To whom it may concern:

The National Milk Producers Federation appreciates the opportunity to provide comment on the United States Department of Agriculture (USDA) Food Safety and Inspection Service (FSIS) proposed Requirements for the Disposition of Cattle That Become Non-Ambulatory Disabled Following Ante-Mortem Inspection (Docket No. FSIS–2008–0022). The National Milk Producers Federation (NMPF), based in Arlington, VA, develops and carries out policies that advance the well being of dairy producers and the cooperatives they own. The members of NMPF's 31 cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of more than 40,000 dairy producers on Capitol Hill and with government agencies.

NMPF supports the proposed USDA amendment to the Federal meat inspection regulations removing the provision to allow FSIS inspection personnel to determine the disposition of cattle that become non-ambulatory after having previously passed ante-mortem inspection, and that all those cattle become non-ambulatory after passing ante-mortem inspection, be condemned and properly disposed. On April 22, 2008, NMPF joined the American Meat Institute and National Meat Association on a petition (attached) to USDA to make this same change.

The proposed regulation will prohibit the case-by-case determination of the status of non-ambulatory cattle that have passed ante-mortem inspection making all non-ambulatory cattle considered unfit for human food. NMPF agrees with USDA that the proposed rule will have minimal impact on the slaughter of cattle; August 2008 data from the USDA's Agricultural Marketing Service indicates that out of 33.7 million slaughter cattle in 2007,

Jerry Kozak, President/Chief Executive Officer

Charles Beckendorf, Chairman

only 1300 cattle (including 600 cull cattle and 700 steers and heifers) would have been impacted by this regulatory change.

We appreciate the opportunity to provide these comments and fully support these proposed regulatory changes. Please contact me if you have any questions about these comments.

Sincerely,

A handwritten signature in purple ink that reads "Jamie S. Jonker". The signature is written in a cursive style with a large, stylized "J" and "S".

Jamie S. Jonker
Director, Regulatory Affairs

Enc.