

NCBA Enhanced Feed Ban Disposal Concerns

Repercussions of Federal Regulations & Lack of Disposal Options

University Of Nebraska Extension Webcast
"Mortality Management for Cow/Calf and Dairy Producers"
June 19, 2009
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What is the Feed Ban?

- Since 1997, the U.S. has prohibited ruminant feed from including parts of other ruminants. This is known as the ruminant-to-ruminant feed ban.
- This proactive feed ban helps protect the U.S. cattle herd from Bovine Spongiform Encephalopathy (BSE).
- This system is working. The U.S. has an extremely low risk of BSE.
- The enhanced feed ban will prohibit certain cattle-derived risk materials from all animal feed, despite the fact that doing so provides negligible safety benefits.
- What it does is create tremendous costs, exacerbate disposal issues, and generate environmental concerns.



The Enhanced Feed ban will cause more problems than it solves
FDA admits this rule:

- Creates a new inedible waste stream that we cannot accommodate or dispose
- Will have a significant economic impact on a substantial number of small farmers and ranchers
- Will cause disposal problems for which there currently are no solutions
- Has the potential for collateral negative impact on other industry sectors like livestock auctions and meat processors
- Will have an estimated compliance cost of \$64 – \$80 million per year and have significant impact on a substantial number of small entities



- FDA acknowledges this will cause environmental difficulties, especially in areas where there are no rendering services available
- FDA estimates the new regulations would generate an additional 28 million pounds of prohibited cattle-derived material at the slaughter plant level and will create an estimated 26 - 41% decrease in cattle carcasses being picked up by rendering services
- Annually there are approximately 3 billion pounds of ruminant carcasses resulting from natural causes that require disposal. This rule adds an FDA estimated additional 369 - 577 million lbs per year that will have to be disposed of by some other means.
- While FDA acknowledges these very real concerns, it has yet to identify any viable solutions.



Consequences to Producers

- NCBA producers began suffering negative consequences of this rule months before it went into effect. Beginning as early as December 2008, many renderers discontinued picking up dead livestock because of the severe economic realities of this proposal.
- NCBA has received numerous reports of producers having difficulty in getting dead animals picked up, and if they are able to find pick-up services, the prices charged by the haulers and renderers is significantly higher than it ever has been.
- In some states/areas producers currently have zero legal disposal options as a result of this rule.



Disposal Options Vary by State and locale

- Disposal problems vary according to States and counties due to differences in disposal laws by states as well as in many cases, county by county within a state.
- Landfills within a state also have varying rules – some do not accept cattle, some did but stopped due to confusion this rule caused, some have limits on maximum numbers per year
- Examples


