



James Mulhern, *President & Chief Executive Officer* | Randy Mooney, *Chairman*

August 12, 2015

Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
Patriots Plaza 3
1400 Independence Avenue SW.
Mailstop 3782, Room 8-163
Washington, DC 20250-3700

Re: Proposed Rule: *Requirements for the Disposition of Non-Ambulatory Disabled Veal Calves*, Docket No. FSIS–2014–0020, RIN 0583-AD54, 80 Fed. Reg. 27269 (May 13, 2015)

To Whom It May Concern:

The National Milk Producers Federation (NMPF) appreciates the opportunity to comment on Docket No. FSIS–2014–0020 intending to amend **9 CFR 309.13(b) and 309.3(e)** concerning regulations on ante-mortem inspection for veal animals. The National Milk Producers Federation, 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 cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of more than 32,000 dairy producers on Capitol Hill and with government agencies.

NMPF supports current U.S. Department of Agriculture Food Safety Inspection Service (USDA-FSIS) regulations which prohibit the slaughter of cattle of any age which are either non-ambulatory prior to or become non-ambulatory after ante-mortem inspection. In fact in 2008, NMPF along with other organizations petitioned the USDA-FSIS to eliminate the loophole which allowed for the reinspection of cattle which become non-ambulatory after passing ante-mortem inspection.¹ USDA-FSIS codified this request in May 2008.²

NMPF also supports current USDA-FSIS regulations which allow for tired or cold animals to have a period of time to rest upon arrival at a slaughter plant. The resting period allows cattle a time to adjust to ambient temperature

Agri-Mark, Inc.
Associated Milk Producers Inc.
Bongards' Creameries
Cooperative Milk Producers Association
Cortland Bulk Milk Producers Cooperative
Dairy Farmers of America, Inc.
Dairymen's Marketing Cooperative, Inc.
Ellsworth Cooperative Creamery
Farmers Cooperative Creamery
FarmFirst Dairy Cooperative
First District Association
Foremost Farms USA
Land O'Lakes, Inc.
Lone Star Milk Producers
Maryland & Virginia Milk Producers Cooperative Association
Michigan Milk Producers Association
Mid-West Dairymen's Company
Mount Joy Farmers Cooperative Association
Northwest Dairy Association
Oneida-Madison Milk Producers Cooperative Association
Prairie Farms Dairy, Inc.
Premier Milk Inc.
Scioto County Cooperative Milk Producers' Association
Select Milk Producers, Inc.
Southeast Milk, Inc.
St. Albans Cooperative Creamery, Inc.
Swiss Valley Farms Company
Tillamook County Creamery Association
United Dairymen of Arizona
Upstate Niagara Cooperative, Inc.
Zia Milk Producers, Inc.

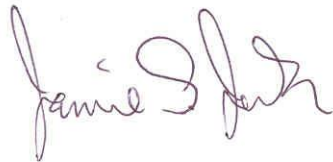
¹ <http://www.nmpf.org/files/file/Citizen%20Petition%20Downer%20Cattle%20042408.pdf>

² <http://www.usda.gov/wps/portal/usda/usdahome?contentidonly=true&contentid=2008/05/0131.xml>

conditions and recover from transit fatigue. Per USDA-FSIS regulations, the cattle are still subject to all inspections and are required to be ambulatory to proceed to slaughter. USDA-FSIS data included in comments submitted by the North American Meat Institute to this Proposed Rule indicate the success with which USDA-FSIS inspectors ensure the implementation of the resting period with proper inspection to ensure non-ambulatory cattle do not enter slaughter.

As current USDA-FSIS regulations have proven effective preventing non-ambulatory cattle from entering slaughter, NMPF does not see a need for the proposed changes.

Sincerely,

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

Jamie Jonker
Vice President
Sustainability & Scientific Affairs