



April 3, 2007

Division of Dockets Management (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane  
Room 1061  
Rockville, MD 20852

Re: Docket No. 2003N-0573

Dear Sir/Madame:

On behalf of the family farm and ranch members of National Farmers Union (NFU), I am writing to respond to the Food and Drug Administration's (FDA) request for comments on the draft risk assessment to evaluate the health effects to animals involved in the process of cloning and to evaluate the food consumption risks that may result from edible products derived from animal clones or their progeny. The decision by FDA to approve the sale of dairy and meat products from cloned animals shows a disregard for family farmers and ranchers and the American consumer and I urge the department to withdraw its approval.

NFU's members are proud of their long history of providing the safest and most abundant food supply in the world. The economic implications of introducing products from cloned animals into the marketplace could be potentially devastating for family producers. Furthermore, there is no consumer demand for such products.

It is clear that FDA did not consider consumer acceptance of cloned products prior to its December announcement. A 2004 Gallup poll found that 64 percent of Americans believe that cloning is "morally wrong" and 58 percent do not want to purchase meat or dairy products from cloned animals. To date, we have no new information to suggest that the American public has changed their mind on this issue.

America's food producers are proud of their hard work and want consumers to know where their food comes from. We have been a long-time advocate for mandatory country-of-origin labeling; NFU also believes consumers have the right to know if the food they feed their families comes from a cloned animal or its progeny. Should FDA decide to move forward with lifting the voluntary moratorium on the sale of meat and dairy products from cloned animals into the consumer food supply, we strongly urge the agency to require labeling of food derived from cloned animals and their progeny.

NFU continues to call for a moratorium on certifying commercialization of transgenic animals or animal-derived products until questions surrounding the legal implications, ethical concerns and economic impacts are answered. Entering into the world of the unknown is not the direction NFU wants FDA to take American livestock producers and consumers.

Our concerns include the following:

- A slight imbalance of a clone's hormone, protein or fat level can compromise the safety of its milk or meat.
- FDA provides no details regarding its plan to remove defective clones from the food supply should hidden or subtle defects be discovered.

- High dosages of hormones and antibiotics are used in the cloning process.
- Cloning creates the potential for wide-spread animal disease due to lack of genetic variability.
- Developed cloning technologies benefit corporate producers rather than family farmers who cannot afford the technology.
- Animal welfare concerns, specifically pregnancies resulting in “large offspring syndrome,” compromise the health of host mothers. This syndrome leads to early-term and stressful caesarian deliveries, with increased mortality when performed outside of veterinary facilities.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Buis". The signature is fluid and cursive, with a large initial "T" and a long, sweeping underline.

Tom Buis, President  
National Farmers Union