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June 30, 2003

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**Re: Department of Agriculture, Natural Resources Conservation Service:
Notice of Proposed Changes in the National Handbook of Conservation Practices.
Notice and request for comments.** [FR: May 30, 2003 (Volume 68, Number 104)]
[Page 32458] [FR Doc. 03-13548 Filed 5-29-03; 8:45 am]

Dear Dr. Hughey:

The Federation of Animal Science Societies (FASS) appreciates the opportunity to comment on the Natural Resources Conservation Service, Conservation Practice Standard, "Feed Management" (Code 592). FASS is a professional organization made up of approximately 8,500 scientists in academia, government, and industry, which exists to serve society through the improvement of all aspects of food animal production. Our organization represents the combined membership of the American Society of Animal Science, the American Dairy Science Association, and the Poultry Science Association.

Attached are comments to the Feed Management Standard on behalf of FASS. We have also included an edited version of the Standard. We trust that the agency will seriously consider the comments provided.

Sincerely,

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FASS - Serving society through food animal agriculture

June 30, 2003
Comments of the Federation of Animal Science Societies
FASS Committee on Environment, Waste Management and Ecosystems

Department of Agriculture, Natural Resources Conservation Service
Notice of Proposed Changes in the National Handbook of Conservation Practices
-- Notice and request for comments --

Conservation Practice Standard
"Feed Management"
(Code 592)

[FR: May 30, 2003 (Volume 68, Number 104)]
[Page 32458] [FR Doc. 03-13548 Filed 5-29-03; 8:45 am]

Introduction

The Federation of Animal Science Societies (FASS) is a professional organization made up of approximately 8,500 scientists in academia, government and industry which exists to serve society through the improvement of all aspects of food animal production. FASS represents the combined membership of the American Society of Animal Science, the American Dairy Science Association, and the Poultry Science Association.

The FASS submits these comments on animal nutrition and feeding issues presented in the Feed Management Practice Standard. We hope that the NRCS will consider our comments seriously as you proceed.

General Comments

As animal scientists, our primary mission is to support the production of animal food products that are safe, healthful and nutritious for human consumption, in a manner that is compatible with the environment. Our goal is to assist in development of voluntary, incentive-based programs for environmental conservation. An important area of voluntary participation in reducing manure nutrients is the acknowledgement of the impact of diet on nutrient excretion by livestock and poultry.

FASS supports the proposed Feed Management Conservation Practice Standard, as an excellent guideline for livestock and poultry producers. Although feeding management requirements are not a mandatory part of a Comprehensive Nutrient Management Plan, use of new technologies in the diets for livestock and poultry may significantly reduce manure nutrient excretion. The scientific basis for the Standard exists and is strongly supportive of the plans and specifications herein. Therefore, the application of this Standard has the potential to reduce manure nutrients lost to the environment.

NATURAL RESOURCES
CONSERVATION SERVICE
CONSERVATION PRACTICE
STANDARD

FEED MANAGEMENT

(No. of Systems and AUs Affected)

CODE 592

DEFINITION

Managing the quantity of nutritionally available nutrients fed to livestock and poultry for their intended purpose.

PURPOSES

To supply the quantity of nutritionally available nutrients required by livestock and poultry for maintenance, production, performance, and reproduction while reducing the quantity of nutrients, especially nitrogen and phosphorus, excreted in manure by minimizing the over-feeding of these and other nutrients.

To improve net farm income by feeding nutrients more efficiently.

CONDITIONS WHERE PRACTICE APPLIES

Livestock and poultry operations where feeding less nitrogen and/or phosphorus will reduce manure nutrients lost to the environment.

Confined livestock and poultry operations with a whole farm nutrient imbalance, with more nutrients imported to the farm than are exported and/or utilized by cropping programs.

Confined livestock and poultry operations that have a significant build-up of nutrients in the soil due to land application of manure.

Confined livestock and poultry operations that land apply manure and do not have a land base large enough to allow nutrients to be applied at rates recommended by soil test and utilized by crops in the rotation.

Livestock and poultry operations seeking to enhance nutrient efficiencies.

CRITERIA

General Criteria Applicable to All Purposes

The diets for specific species of animals shall be developed in accordance with recommendations from one of the following:

- standards outlined in the most current recommendations of the National Research Council (NRC).
- recommendations of the land grant university.
- standards developed by the professional nutritionists of livestock and poultry production companies, feed companies, and/or feed suppliers.

Feed analyses shall be conducted by laboratories whose methods are accepted by the Land Grant University in the state in which the feeding strategy will be implemented. Data from analyzed feed ingredients and/or appropriate historic feed analysis information for the operation will be used for adjustments of ration formulation.

Diets and feed management strategies shall be developed by qualified feed management specialists, which include professional animal scientists, independent professional nutritionists or other comparably qualified individuals.

When required by state policy or regulation, animal nutritionists shall be

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May 2003

certified through any certification program recognized within the state.

Diets shall be formulated to provide the quantities and correct relative ratios of available nutrients required by the animal species to meet species goals for which the plan is being developed.

Adjustments to nutrient levels shall be provided to meet specific genetic potential, environmental demands, and/or requirements to insure health, well-being and productivity.

One or more of the following feed management practices and/or diet manipulation technologies shall be used to reduce N and/or P (and potentially other nutrient) excretions while maintaining the health, well-being and productivity of the animal.

- Formulating diets closer to animal requirements.
- Reducing protein and supplementing with amino acids (AA).
- Manipulating the crude protein and energy (carbohydrate and fat) content of the diet to enhance the availability of amino acids (ruminants).
- Using sources of protein for ruminants that optimize microbial protein synthesis and ruminally undegraded protein, and allow for feeding less total nitrogen.
- Using highly digestible feeds, as appropriate, in the diet.
- Using phytase and reducing the supplemental phosphorus content of the diet (non-ruminants)
- Reducing the phosphorus content of the diet of ruminants when it is being overfed by substituting low-phosphorus feeds.

- Using selected enzymes or other products to enhance feed digestibility or feed use efficiency.
- Using growth promotants, as allowed by law, to improve efficiency of nutrient use.
- Implementing phase feeding.
- Implementing split-sex feeding.
- Using other feed management or diet manipulation technologies that have demonstrated the ability to reduce manure nutrient content.

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When analysis of manure is done to determine manure nutrient content, the analysis shall be performed by laboratories whose methods are accepted by the Land Grant University in the state in which the feeding strategy was implemented.

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CONSIDERATIONS

Consider nutrient requirements for production based upon stage of growth, intended purpose of the animal and the type of production (e.g., meat, milk, eggs) involved.

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Using management practices described in the NRCS Nutrient Management (Feed Management) Technical Notes for the specific animal species.

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Analyzing the drinking water consumed by the animals to determine its nutrient content, and adjusting the diet to account for this source of nutrients.

Evaluating different feed ingredients (e.g. by- products) and their potential impacts on the nutrient content of excreted manure.

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Determining the potential impact of feed management on the volume of manure excreted and on manure storage requirements.

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Assessing the impact of feed management practices, animal management practices, and diet

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manipulation on manure odors, pathogens, animal health and well-being.

Using concentrates and forages grown on the farm to minimize the quantity of nutrients imported to the farm, and to maximize the recycling of nutrients on the farm.

Analyzing excreted manure or manure from storage facilities to determine manure nutrient content and the impact of the feeding strategy.

Conducting a farm balance by calculating total nutrient inputs and outputs from the farm before and after implementing the practice.

PLANS AND SPECIFICATIONS

Plans and specifications for feed management shall be in keeping with the requirements of this standard. They shall describe the specific feed management practices and/or technologies that are planned for the operation.

The following components shall be included in the feed management plan:

- the type of technology, or technologies, and/or feeding practices that will be used on the operation.
- feed analyses and ration formulation information prior to and after implementation of feed management on the operation.
- the measured, nutrient content of the manure prior to the implementation of feed management on the operation.
- the estimated impact that feed management will have on manure nutrient content.
- guidance for how often the feed management plan shall be reviewed and potentially revised.

- the quantities and sources of nitrogen and phosphorus that will be fed.
- Resulting manure analyses, following adoption of practices.
- Identification of the qualified feed management specialist who developed the plan.

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OPERATION AND MAINTENANCE

The producer/client is responsible for the operation and maintenance of the feed management plan. Operation and maintenance activities address the following:

- periodic plan review to determine if adjustments or modifications are needed.
- routine feed analysis to document the rates at which nitrogen and phosphorus were actually fed. When actual rates fed differ from or exceed the planned rates, records will indicate the reasons for the differences.
- maintaining records to document plan implementation. As applicable, records include:
 - records of feed analysis and ration formulation, including the record of ration formulation used prior to and after implementing the feeding strategy.
 - records of the initial estimate of the impact the feeding strategy was expected to have on reducing manure nutrient content.
 - records of animal performance.
 - records of any manure analysis that was done before and after the feeding strategy was implemented to determine manure nutrient content.

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- **dates of review and person performing the review, and any recommendations that resulted from the review.**

period longer than five years if required by other Federal, state, or local ordinances, program, or contract requirements.

Records of plan implementation shall be maintained for five years, or for a

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