

The
NATIONAL HUMANE
EDUCATION SOCIETY

Fostering a sentiment of kindness to animals

September 26th, 2004



Members of the FDA:

I am writing on behalf of The National Humane Education Society (NHES) and its 400,000 supporters nationwide to strongly urge the FDA to **permanently** ban the marketing of any products made from “downed” animals (Docket No. 2004N-0081). This ban is vital in preventing the spread of “mad cow disease” and protecting millions of cattle from unnecessary cruelty and neglect.

As I am sure you are aware, there are countless reasons for the occurrence of diseased and incapacitated animals within the factory farm and slaughter industries; however, all of these explanations boil down to the same facts: Downed animals, whether by injury or illness, *are substantially a result of abusive factory farm conditions* where the physical/mental well-being of the animals is sacrificed at the gain of corporate profits. In addition, animals once down, are routinely left to die slowly where they lay or are forcefully dragged, pulled and/or shoveled into the slaughterhouses.

Now the farm industry is seeking to narrow the definition of the USDA’s downed animal law by excluding any non-ambulatory cattle due to “fatigue, stress, obdurator nerve paralysis, obesity, fractured appendices, severed tendons or ligaments, or dislocated joints.” Basically, the industry is trying to exclude cattle that are deemed only “injured” and not “sick”.

With hundreds of cows slaughtered each day, inspectors cannot reliably determine the cause of these various injuries/ailments; this narrower definition would put the public at dangerous risk of consuming diseased animal product. The cows diagnosed with “mad cow disease” here in the U.S. had originally been diagnosed as non-ambulatory due to *calving injuries*. Excluding animals with seemingly unrelated injuries/ailments *does not protect* the humans from potentially fatal animal products and allows further unnecessary animal cruelty.

In closing, NHES strongly requests the FDA to permanently ban the marketing of any products made from downed animals. *We adamantly request that this ban include all downed cattle no matter the source of their condition.* Although the banishment of products from downed cattle will not require humane treatment of farm animals, it can still bring about such changes: Preventing unsanitary cattle product from being approved for sale *will give factory farms financial incentive to treat their animals better*, as they will lose profit for each downed animal they cannot slaughter.

Thank you very much for your time and effort regarding this issue. NHES will also continue to work for animal welfare and responsible and humane communities nationwide. I look forward to your positive influence on this very serious issue.

For the animals,

Maria Beth Keith, Humane Education Assistant

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