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October 18, 2000

U. S. Food and Drug Administration
Dockets Management Branch
5600 Fishers Lane, Room 1061
Rockville, MD 20785

Re: Docket No. 98P-0151/CP1
Petition to Prohibit the Slaughter of Downed Animals

Gentlepersons:

The undersigned would greatly appreciate it if you would consider the following points in support of the above-entitled Petition:

1. Animals who are too sick or injured to stand should not be allowed to enter the human food chain.
2. Downed animals, in addition to posing an increased risk for bacterial contamination, may be afflicted with a form of BSE (Bovine Spongiform Encephalopathy or "Mad Cow Disease") – a disease which has been linked to fatal human illness (CJD or Creutzfeldt-Jakob Disease).
3. Unfortunately, downed animals are not moved humanely—they are typically pushed with tractors or dragged with chains—inhumane practices which cause bruises, abrasions, broken bones and torn ligaments.
4. Downed animals comprise a very small percentage of animals slaughtered, and prohibiting their marketing will cause no undue economic hardship.
5. Ninety percent of downed animals can be prevented, according to industry experts' estimates, with better care and handling. Removing the market for downed animals will provide an incentive for the industry to prevent downed animals in the first place.

I am amazed that these inhumane practices are being allowed in our country. Several foreign countries have outlawed the practice of utilizing downed (injured/sick/diseased) animals to be treated in this manner. We are supposed to be leaders in the world and if we exhibit such inhumanity toward our animal friends, it is an unfortunate example of a gross lack of humanity on the part of all Americans.

Thank you for considering the above, and I hope that you can do something as soon as possible to remedy this unfortunate circumstance for our fellow animals.

Very truly yours,


Betty Harla

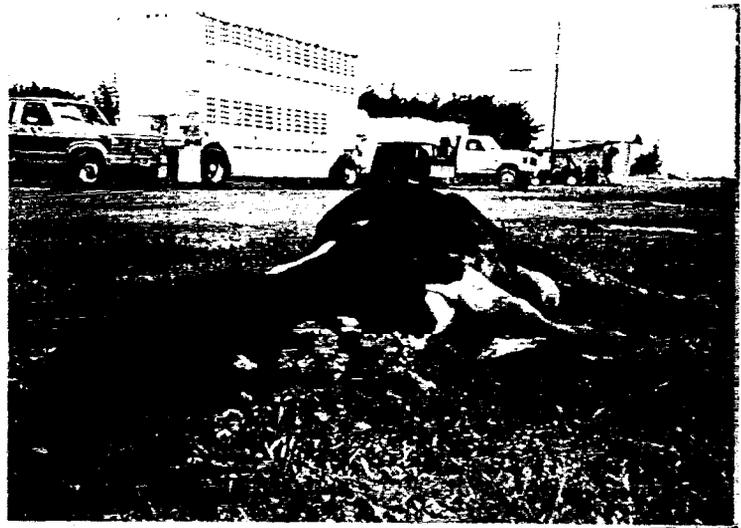
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USDA Says "No Downers" in School Lunch Program

This summer, the USDA's Agricultural Marketing Service (AMS) reviewed and revised its policy regarding the purchase of ground beef for the National School Lunch Program (beginning in School Year 2000–2001) and other federal food and nutrition programs, and it has taken a major step in the direction of ending the downed animal trade. According to an agency statement, "USDA will no longer accept ground beef that includes product from non-ambulatory cattle, commonly known as 'downers.'



Carcasses originating from cattle which must be processed in accordance with *FSIS Directive 6900.1R1 – Humane Handling of Disabled Livestock*, issued November 2, 1998, must be segregated to assure that the product from these carcasses is not included in the USDA purchased ground beef."

This development shows a growing consensus—even among industry and government officials—that the marketing and slaughter of downed animals causes intolerable animal suffering and poses an unnecessary risk to human health.

