October 23rd 2000
H. Frederick Gehrlach
2405 Algonkin Trail
Manasquan, New Jersey
08736-1609

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

0102 '00 OCT 27 A10:41

Re: Docket # 98P-0151/CP1

Gentlemen:

Downed animals, animals so diseased or badly injured that they cannot even walk, should not be allowed to enter the human food chain. In addition to posing an increased risk for bacterial contamination, there is evidence that some downed animals may be afflicted with a form of BSE, "Mad Cow Disease", a disease which has been linked to a fatal human illness, Creutzfeldt-Jacob Disease.

Downed animals commonly lie in alleyways, without food, water, or veterinary care, until it's convenient to take them to slaughter, usually the next day. Thousands die slowly from neglect before ever reaching the slaughterhouse.

It is practically impossible to move downed animals humanely and they are typically pushed with tractors or dragged with chains — inhumane processes which cause injuries ranging from bruises and abrasions, to broken bones and torn ligaments.

Downed animals comprise a very small percentage of animals slaughtered, and prohibiting their marketing will cause no undue economic hardship.

98P-0151 Industry experts have estimated that 90% of downed animals can be prevented 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!

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Please kindly stop this cruelty!

Respectfully Submitted,

H. Frederick Gehrlach

MR. F. GEHRLACH
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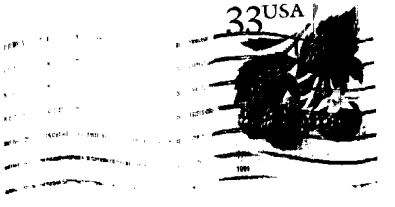

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