

# Public Citizen



Buyers Up • Congress Watch • Critical Mass • Global Trade Watch • Health Research Group • Litigation Group  
Joan Claybrook, President

March 14, 2001

U.S. Food and Drug Administration  
Dockets Management Branch  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

RE: Docket Number 98P-0151/CP1

Dear Docket Clerk:

On behalf of Public Citizen, I am writing in support of the petition filed by Farm Sanctuary to prohibit the slaughter of "downed animals" and preventing that meat from entering the food supply. Public Citizen is consumer organization founded by Ralph Nader in 1971 and we represent 150,000 members.

We take this position of a number of reasons.

- First, with the growing concern of Bovine Spongiform Encephalopathy (BSE) possibly contaminating our livestock, we believe that immediate steps need to be taken to remove "downer" animals from herds. "Downer" animals show the symptoms of BSE, so we believe that immediate precautions need to be taken to ensure that our livestock is free from this deadly disease.
- Second, since the United States Department of Agriculture has already taken the drastic step of prohibiting the use of meat from "downer" cows to be used in the National School Lunch Program, it indicates to us that there is growing concern among certain government agencies that "downer" cows could be carrying BSE or a variant of it.
- Third, and perhaps most important, in testimony delivered on March 8, 2001 before the House Subcommittee on Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations, Dr. Bernard Schwetz, Acting Commissioner for the U.S. Food and Drug Administration, clearly stated that the

98P-0151

Ralph Nader, Founder

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FDA was already stretched beyond its limits in providing adequate inspection of domestic and foreign animal stocks, animal feeds, and different food and pharmaceutical products that are made from rendered meat, to prevent BSE from appearing in the United States. It seems to us that without an adequate inspection program, one of the easier steps that could be taken would be to err on the side of caution, and set clear rules for the elimination of "downer" animals from healthy livestock and prevent their meat from entering the food supply. To do otherwise would be playing "Russian roulette" with the health of domestic livestock and American consumers.

As Dr. Schwetz also stated in his March 8 testimony, "FDA is a recognized gold standard for food safety regulation." One way to preserve that reputation would be to take all possible steps to prevent the introduction of a very deadly disease into the United States. Consequently, we call on you to approve this pending petition.

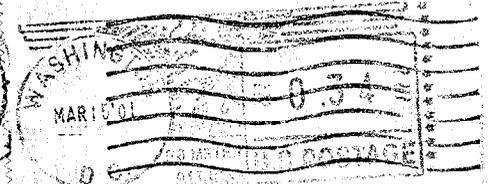
Sincerely,



Wenonah Hauter, Director  
Critical Mass Energy and Environment Program



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