



HUMANE EDUCATION NETWORK

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March 10, 2001

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

Docket No. - 98P-0151/CP1

To Whom It May Concern:

We are writing to urge you to grant the petition identified by the subject Docket No.

It is impossible to move downed animals humanely. In most instances, they are pushed with tractors or pulled with chains to the slaughter line. Such treatment causes injuries ranging from bruising and abrasions to broken bones and torn ligaments, none of which is conducive to providing healthy meat.

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, a disease that has been linked to the fatal human illness CJD.

Animals which are too sick or injured even to stand should not be permitted to enter the human food chain. They comprise a very small percentage of animals slaughtered and prohibiting their marketing will cause no undue economic hardship. In fact, industry experts have estimated that 90% of downed animals can be prevented with better care and handling. It follows, therefore, that if the market for downed animals is removed, it will provide an incentive to industry to prevent the injuries and lack of care that create downed animals.

The petition identified by the referenced Docket No. is made in good cause and deserves approval.

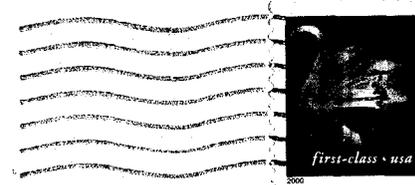
Sincerely,

S.M. Bancroft
Director

98P-0151

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