

11-14-00

To: Dockets Management Branch,

For too long, the downed animal trade has survived at the expense of disabled livestock. It is about time that this issue is addressed. As we inch closer to the end of the year, this horrible practice of slaughtering downed animals continues at a steady pace. As a country that preaches civility and humane treatment, some of us are still living in ancient times. Just this past 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 the 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 referred to 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 elaboration shows a increasing consensus--even among government and industry officials--that the marketing and slaughter of downed

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animals causes intolerable animal suffering and poses an unnecessary risk to human health.

Below are several suggestions that I strongly believe merit a closer look:

- (1) Animals who are too sick or injured even to stand should not be allowed to enter the human food chain.
- (2) 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 (Bovine Spongiform Encephalopathy or "Mad Cow Disease"), a disease which has been linked to a fatal human illness (CJD or Creutzfeldt-Jakob Disease).
- (3) It is virtually impossible to move downed animals humanely, as they are usually pushed with tractors or dragged with chains--inhumane processes which do cause injuries ranging from bruises and abrasions, to 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.

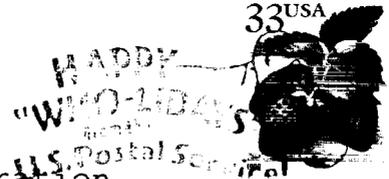
In the end, we must all make sacrifices to help alleviate the unnecessary suffering of these gentle creatures. Please remember docket number

98P-0151/CPI, thank you.

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