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26 Jan 2001

9186 '01 FEB -1 19:40

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

RE: Docket 98-0151/CP1

Dear Officials:

I am writing to support petition 98P-0151/CP1 to prohibit the slaughter of downed animals. As you know, slaughterhouses continue to use sick animals for both human and animal food.

There are public health issues with the use of such animals; as you know, the U.S. Department of Agriculture recently prohibited the use of downed cows for the National School Lunch Program. In Europe, some of the problems with bovine spongiform encephalopathy could have been avoided had sick animals not been introduced into the animal feed and human food chains.

However, I have strong objections to the way sick animals are typically treated in the meat industry. Animals who are so ill they cannot even stand are subject to monstrous cruelty by being pushed around -- alive -- using earth-moving equipment. The creatures suffer terrible wounds during their processing before they are killed.

Given that by the meat industry's own figures, downed animals are a small percentage of the total input into slaughterhouses, I do not see how prohibiting their use can have a significant cost to the industry.

In summary, based on concerns for the health of human beings and of animals who may consume meat and byproducts from animals who are sick, downed animals should not be included in slaughterhouse inputs. In addition, concern for animals themselves dictates that in a humane society, they should be put out of their misery using euthanasia, not left to die slowly and in pain.

Very truly yours,



M. E. Kabay, PhD, CISSP

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98P-0151

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