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July 16, 2000

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Food Safety and Inspection Service  
United States Department of Agriculture  
Washington, D.C. 20250-3700

Ms. Patricia Stolfa  
Assistant Deputy Administrator  
Office of Policy, Program Development and Evaluation  
Room 402 Cotton Annex  
300 12th Street SW  
Washington, DC 20250-3700

Re: HACCP-Based Inspection Models Project:  
Food-Safety-Related and Other Diseases and Conditions Observable at Post-Mortem

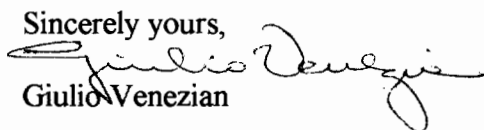
We read an article in today's St. Louis Post-Dispatch about a proposed reclassification of carcasses of cancerous and diseased animals as safe. It mentioned that the agency has extended the time for public comment until August 29, 2000. We assume that the article refers to the HACCP model, and we wish to comment on it.

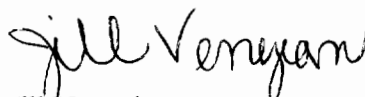
The objective of reducing bacterial contamination of meats is certainly commendable. This problem has reached scandalous proportions and needs to be addressed. Why does it have to be at the expense of relabeling the meat of cancerous and diseased animals as fit for consumption? Among the conditions listed as acceptable is Lymphoma. This seems to be a strange condition to accept. A lymphatic cancer is likely to be distributed throughout the lymphatic system, the spleen, the bone marrow, and perhaps the liver and other organs. An inspection of the carcass that takes place in only a few seconds and detects the presence of lymphoma in one lymph node is not likely to reveal the stage the cancer has reached. In a human being the staging process is long, laborious and expensive. Can it be any different for animals?

Can the USDA assure us that consumption of meat affected with cancer will not produce cancer in humans? If there is no safety concern, why do blood banks reject donations from cancer patients?

It seems that the acceptance of meat tainted by cancer and other diseases listed in the proposed regulations is questionable and unnecessary. There is no need to do this simply to reduce bacterial contamination. Bacterial contamination is inexcusable and should be reduced regardless, but to trade one for the other is beyond comprehension.

Sincerely yours,

  
Giulio Venezian

  
Jill Venezian

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