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FSIS Docket Clerk
Docket 03-0251-F
Room 102 Cotton Annex
300 12th and C Street SW
Washington DC 20250-3700

Re: 9 CFR part 301, 309 etc.
Docket 03-0251-F – public comment
Use of specified risk materials

Dear Sir:

Any of this meat prohibited for human food shall include no use for any pets either. If it is inedible for humans, it is inedible for pets and other animals as well. We do not need to make our pets sick either or poison them or any other animals or humans.

We should and must phase out eating and growing all beef cattle. Raising cattle is completely environmentally destructive and this risk that has been caused by lax USDA regulations shows that we should phase out all eating of beef cattle/cows, sheep, lamb, goats, etc. It is clear that such laxity has been allowed to be present courtesy of USDA being captive to the agribusiness industry, that no American can safely eat any animal any more. With chickens being fed to cattle, sheep being fed to pigs, it is clear that we have created a monstrosity in our animal population and causes diseases to spread among them. Even our deer have a bse related disease. I recommend that USDA phase out all growing and raising of all animals for consumption. Killing baby animals for human consumption is eating corpses, as George Bernard Shaw would say. It is terribly inhumane and disgusting, as well.

I note no use anywhere of the word "humane" in any connection with the slaughter of any animal and this is necessary to be included in every situation where the word "slaughter" or kill is inserted. Please insert the word "humane" and make sure penalties in the tens of thousands of dollars are inserted into this regulation for agribusiness which does not comply. It is clear that there have been many published reports of the horrors of slaughterhouses. I enclose Michael Pollans' latest report on the garbage like chicken feces that are fed to cattle, and it is time that the word "humane" is inserted in any connection with animals. I note that USDA has no understanding of that word since it has neglected to date to use it in this regulation at all, but it must be included.

Even though some indications are not evidenced because they are not tested for, it is clear that prudent people will eliminate eating all meat entirely. USDA has made it clear in this proposed regulation that the testing done is insufficient, lax, negligent and late so that the American public clearly cannot rely on the work done by this agency, which is

captive to the cattlemen and the agribusiness industries. This agency has forgotten that it has any protective role for the American public. USDA FSIS is too late with this regulation, too little with this regulation and too lax to be entrusted with this work anymore.

I think meat packages should now contain warning labels similar to cigarette packages, that set out in full the bse contamination that exists, that tests have not been done on over 99% of all cattle to fully establish the risk present, that the tests that are done are not conclusive, and that there is a risk involved in eating this meat, since no one was present at the killing of the cow to verify that the cow was killed in accordance with present day regulations. **THIS WARNING LABEL ON THE MEAT PACKAGE IS REQUIRED AND NECESSARY RIGHT NOW SO THAT THE AMERICAN PUBLIC FULLY UNDERSTANDS THE RISK INVOLVED IN EATING THIS MEAT.**

I do not see the word "condemned" clearly explained in this proposed regulation and I think it should be – that is negligent on the part of FSIS. I also think any condemning or condemnation should fully set out the humane standards that must precede any such act of condemnation.

It is quite clear that FSIS has not acted in accordance with FMIA, since the American public has been getting adulterated, drug laden, salmonella, escheria coli laden meat with hovine growth hormones in it for quite some time. It is quite clear that FSIS has allowed all our farm animals to be grown by agribusiness so that they are continually stressed and unhappy animals, living in crates so small they cannot turn around, being allowed to grow so heavy they cannot stand on their feet (and then we wonder why we have obesity in humans who eat that meat from those animals)!!!!!!!!!!!!

These FSIS regulations along with what is proposed here **MUST INCLUDE REGULATIONS THAT** demand humane standards for growing any animal, including not ripping veal calves from their mothers immediately after birth, chopping beaks off chickens when first born, feeding veal calves **BLOOD** instead of their mother's milk, dehorning cattle without any anesthetic, ripping off udders from cows, etc. etc. etc. FSIS has allowed all American animals to be mutilated and abused and this should be changed in these regulations – and there is nothing more important than this!!! Protection of farm animals and enforcement of any humane standards has received zero attention from FSIS and the American public does care about this.

Also it should be made clear to the American public that BSE is present in non ambulatory as well as in ambulatory animals!!!!

WE MUST STOP FEEDING ALL ANIMALS TO OTHER ANIMALS. CHICKENS WERE NOT DESIGNED TO EAT COWS. COWS WERE NOT DESIGNED TO EAT CHICKEN FEATHERS AND CHICKEN FECES. FSIS HAS ALLOWED THIS HORROR TO GO ON IN AMERICA!!!! FSIS SHOULD BE CONDEMNED.

I note that Japan tests ALL cattle, and it seems that we need to develop a test to test living cattle and all cattle must be tested. Eating corpses is revolting and turning to a plant based diet would be far superior than eating diseased meat. It is time to make the prudent recommendation 'DON'T EAT MEAT'!!!!

I note frequent use of the word "estimate" and information that the FSIS does not have full information. Therefore, we cannot rely on any of the information FSIS has supplied in this proposal. I also note that Harvard is consistently equated with an Alabama epidemiology lab – can we have an elaboration of exactly what the connection is of Harvard with Alabama epidemiology before any action is taken? I also have questions about the validity of the information that "Harvard" supposedly provided and think this should be investigated much more closely. It seems to me FSIS may be trying to skate through this mess by using the Harvard name.

Allowing the use of bone marrow is hazardous. It is clear that ground up bone marrow is used in garden products and in England a person came down with Creutzfeld Jacob when the main route was connection with bone marrow used in a garden supply. Bone marrow is dangerous, rendering is dangerous and use of both of these must be stopped immediately. Gelatin can transmit bse too and there is no mention of cessation of use of gelatin in this proposal. Rendering of all beef must cease now.

On page 10 of 28, it is clear that beef establishments simply cannot keep spinal cord and DRG out of their AMR products. Therefore, we need to cease letting these beef establishment produce this product totally. If they cannot do it, they must cease doing it!!!

FSIS does not have enough inspectors. The inspectors cant tell by looking about this disease. There are not enough inspections being done because the USDA does not allow enough funds from its bureaucracy for this kind of work preferring to spend it on trips and office furniture for its Washington bureaucracy. The system is so full of holes that it cannot be safe for Americans at this point.

If it is not required that spinal cord or DRG be on the labeling for beef, it is clear that it ought to be on the label so that the American public can cease being fooled by agribusiness and the FSIS.

We know that there are violations of the prohibition against proteins in feed for cattle. We know that animals that die on the farm are rendered into cross contamination. We know that high risk tissue from cattle is in products being eaten, SO WE KNOW THAT AMERICAN CITIZENS ARE BEING HURT, INJURED AND KILLED. We know that the cattle industry is in such a rush for profits that they will do or say anything to make more money, including abuse of farm animals, drugging them, etc.

I note that on page 15 – the FSIS seems to be sneakily trying to let dangerous products remain in the food stream, saying that sections of the vertebral column may be used as a source material for products produced from eligible rendering. This certainly is unsafe.

I also note that T bone steaks seem to be unsafe since there is potential exposure to BSE from the presence of spinal cord and DRG in bone in cuts of beef. People should be warned about this instead of it being swept under the rug. There should be a warning on every package of t bone steak of the risk to people from eating this – that they could waste away in a fatal disease. BSE Creutzfeld Jacob is a very very horrific disease for humans and the risk of such a horrific disease is very real and ugly.

If FSIS has not information on the extent to which DRG is found in hand deboned meat, it should prevent all hand deboned meat from being eaten by any citizen since if there is no data we need to prevent problems for people. When data becomes available showing it is safe, then it can be offered for sale. A PRODUCT THAT IS NOT KNOWN TO BE SAFE SHOULD NOT BE OFFERED FOR SALE AS A FOOD.

I note continual mention of one case of Creutzfeld Jacob, when for all we know there could be millions of such cases there. Nobody does post mortem autopsys so the human problem is not fully known so to cite one case that is known tells us nothing.

On page 17 of 28, disposal in an “appropriate manner” must be fully set forth in these regulations. I see no reason to leave it open ended as to how diseased animals should be disposed of. We must set forth safe requirements for how that diseased animal is disposed of in all detail. Otherwise profiteers will dispose of it quick and dirty –maybe on someone’s front lawn. We need specific regulations to make sure that the public is protected. BURNING HAS PROBLEMS FOR example!!!

When agribusiness gets cattle, full records on where that cattle came from, how many came, what the address is of where the cattle came from, its health status, where it goes – all those records shall be kept for a minimum of ten years. This disease takes twenty years to show up in humans. We need a way to check back. Someone is trying to sweep this monster under the rug in allowing such records to be disposed of in one year!!!!!!!!!!!!

I note the statement "FSIS will ensure the adequacy and effectiveness of the establishment's procedures." FSIS record on enforcement is sad to date. There is never enough budget for enforcement in any sector, so crimes are committed every day. I think FSIS needs to come up with a more specific statement than this as to enforcement. I think huge fines, jail, etc would help to keep "establishments" more on the straight and narrow. I also think stating right now how often each establishment is visited would do more to reassure that "establishments" follow safe "procedures", even though there is nothing stated in here as to what "procedure" is anointed.

I also note that FSIS proposes to visit "establishments". I also think the public should have full rights to visit slaughterhouses so that they can see for themselves whether the killing is humane or not. Keeping those places of horror so closed leads to inhumane treatment of animals. I also think the public should be able to view records kept of such slaughterhouses.

I also think the FSIS should establish surprise visits, where no one knows they are coming and they review an "establishment's" procedures. Far too often, these "establishments" have fully gory, horrific procedures, brutal to men and animals. For reference, not too long ago the NY times can out with an expose of conditions in slaughterhouses. There are also several books out on the market, which fully explain the horrific conditions in slaughterhouses – it seems strange that FSIS is not aware of these exposes and seems to allow them, to the disgrace of the American people.

All livestock should also be banned for pet food. No pet should be fed from a downer cow.

I also note that tests may show bse on the brain and ileum but no on other parts of the cow. Again, on page 19 disabled cattle are spoken as being "condemned" but there is no use of the word "humane" handling of this cattle in there. I think in every instance where there is any talk of a downer or hurt or sick cow, there must be the word 'HUMANE' OR HUMANELY TREATED INSERTED AS APPLICABLE.

NO ABUSE OF A DOWNED COW OR ANIMAL SHOULD EVER BE TOLERATED.

It is interesting that twenty five years after this disease being discovered, we still do not have a live animal test for this disease. Research has been slow and evidently diverted to other less important issues. Taxpayer money was not well spent by FSIS in this matter in how this was handled.

This regulation must also set forth far better record keeping by agribusiness on cows, where bought, when bought, seller of the cows, markings on the cows, tag number of the cow, how many calves from the cow, etc. etc. The day of the wild and wooley west is over and the cows need to be counted now.

Since GPEA exists, why can't comments on these proposed rules be allowed via the internet, which is a recognized method of communication today. Is it because documents are far easier to hide when they are hand written? This is an objection to the failure on the part of this agency to accord to GPEA in proposal comments by the public. This seems deliberate on the part of US Dept. Agriculture to prevent people from commenting on the actions of this regressive agency.

All records on cows/cattle/animals shall be kept for a minimum of seven years, readily available for inspection. Letting people throw out records after one year is absolutely wrong with a disease that can take years to develop in humans.

Barbara Sachau
15 Elm St
Florhau Pk nj 07932

copy Rodney Frelengheysen
Sen John Corgine
Sen Frank Lautenberg