

MCDONALD'S MEATS, INC.

"The Jerky Stop"

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FSIS DOCKET ROOM

204 Center St.

PO Box 117

Clear Lake, MN 55319

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Phone (320) 743-2311

Fax (320) 743-4817

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FSIS DOCKET CLERK, DOCKET#03-025IF
102 COTTON ANNEX
300 12TH ST SW
WASHINGTON, DC 20250

RE: USDA BSE Regulations

I would like to offer my comments on two areas of the BSE regulations, the complete ban on downed animals and the verification needed to be done by processors of their suppliers.

The complete ban on downed animals is unjustified. I can understand restrictions on cattle that have central nervous system disorders and other illnesses, but not on animals that have injuries such as broken extremities. There is no food safety issue with animals that can't walk because they have suffered broken legs or pelvic problems due to birthing, therefore no need for this policy. The basis for USDA's BSE testing program has been that non-ambulatory animals most likely to have the disease are brought to the slaughterhouse to be killed and then tested. The rule preventing slaughtering of all non-ambulatory animals will result in fewer animals being tested for BSE, especially those with the greatest chance of having it. The likelihood of animals being tested back on the farm or at rendering is very slight. Producers and processors should ask that the animal be tested for BSE at the slaughter plant, so that a lot of money will not be wasted.

Further processors being forced to insure slaughter compliance with BSE regulations. According to the regulation, it is against the law for a slaughtering plant to sell product containing SRMs unless the product is marked that it contains them, and there is a way for them to be removed. So it makes no sense that further processors, including me, buy USDA-inspected meat with the mark on it, then have the possibility of FSIS mark it as "over 30 months of age", if for some reason I cannot obtain verification letters on that product. This is the same thing that happened last year, when processors were forced to verify that their suppliers were complying with the E.colio157.H& regulations by having verification letters, even though the suppliers products carried a USDA mark of inspection. The USDA mark of inspection on a meat product says that it has been inspected by a USDA inspector and "passed", which to me means that the product was produced in accordance with the regulations published by FSIS. What's the point of having the mark of inspection if it means nothing? Why does it have to be verified by a letter stating the supplier followed USDA meat inspection regulations? If that is the way USDA is operating its meat and poultry products inspection system, then to take this policy to its illogical conclusion, there is no reason to carry out any inspection prior to the processing plant and those inspectors who work at slaughter plants could be let go.

Thank you,
Jennifer Young


Manager

McDonald's Meats, Inc