

566

RECEIVED
FSIS DOCKET ROOM

04 APR 16 PM 1:01

Dakota Resource Council
P. O. Box 1095, Dickinson ND 58602-1095
(701) 483-2851; www.drcinfo.com

April 12, 2004

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

Re: Docket 03-025F: Comments on Proposed Rule for the ban on the slaughter of downed cattle, animals to sick to stand, for human food.

Dear Sir or Madam:

Dakota Resource Council is submitting these comments concerning the Proposed Rule by the United States Department of Agriculture (USDA) for the ban on the slaughter of downed cattle, animals to sick to stand, for human food.

Dakota Resource Council (DRC) is a nonprofit, grassroots organization. Our members are working for the preservation of family farms, rural communities and agricultural economy.

DRC strongly believes that the Proposed Rule for the ban of downed cattle for human food needs to be continued, for the reasons set forth below.

1) Downed (unable to stand) and Diseased Animals Must be Segregated and Slaughtered Separately.

The segregation of cattle that are downed or diseased is a must to prevent Bovine Spongiform Encephalopathy (BSE) contamination of the U.S. beef supply. A USDA certified veterinarian must make the determination of the animal's health status. All segregated animals should be slaughtered separate from the rest of the day's kill.

2) All Downed (unable to stand) and Diseased Cattle Must be Tested for Bovine Spongiform Encephalopathy (BSE).

Testing all downed and diseased cattle will allow USDA, US beef producers, and US and foreign consumers to know the prevalence of Bovine Spongiform Encephalopathy (BSE) in our country. It would also help determine if the BSE problem is a Canadian or North American problem.

3) Meat From Downed (unable to stand) or Diseased Cattle Must be Withheld From the Human Food Supply.

The meat from downed and diseased cattle should never go into the human food supply. If this measure was in place when the December 2003 Washington BSE cow was slaughtered, there would not have been a need to recall 10,000 pounds of meat and risk the health of the American public. An animal that breaks a leg at the packing plant could be used for human food upon a USDA certified veterinarian's approval.

4) Meat From Downed (unable to stand) or Diseased Cattle Must Not be Rendered into Feed and Feed Supplements.

Suspect animals, including blood meal, should not be rendered into feed or feed supplements for any ruminants, hogs, or chickens. As has been reported since the December 2003 case of Bovine Spongiform Encephalopathy (BSE) in Washington, chicken litter has been used in ruminant feeds. This has a potential for transmission of BSE to cattle.

5) A Program Must be Established and Publicized for Producers to Submit Animals that Die on the Farm for Bovine Spongiform Encephalopathy (BSE) Testing.

Establishing a method for producers to easily submit suspect animals for testing is a must. The USDA needs to work with state and local veterinarians to educate beef producers on the early symptoms of BSE and who to contact for testing of suspect animals/carcasses.

Conclusion

The Dakota Resource Council believes the Proposed Rule for the ban on slaughter of downed, animals unable to stand, is warranted and needs to be updated with these provisions until further research into the prevalence of Bovine Spongiform Encephalopathy (BSE) is determined.

Sincerely,

Dakota Resource Council

Link Reinhiller, TTF chair
Hazen, ND 701-873-5201

/s/ Robin Sherwood
Field Organizer Staff
Dakota Resource Council
PO BOX 1095
Dickinson, ND 58602
701-483-2851
robin@drcinfo.com