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April 30, 2004

FSIS Docket Clerk
Docket 03-025IF
Room 102
Cotton Annex
300 12th and C Street Southwest
Washington D.C. 20250-3700

Dear Sir or Madam:

Re: Docket 03-025IF, Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle

I am writing to comment on the interim final rule on BSE which was released after the discovery of a BSE-infected cow in Washington. While the rule changes make some progress, they do not go far enough.

Specifically, I urge the agency to do the following:

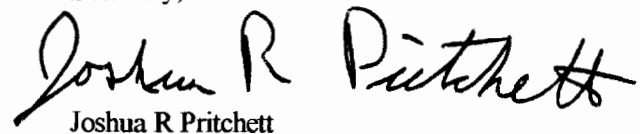
- Ban the practice of Advanced Meat Recovery. The fact that Advanced Meat Recovery will no longer be allowed for animals over the age of 30 months is progress, but does not go far enough. Right now, the presence of spinal cord and other nervous system materials is allowed in AMR product. The agency only requires that products containing these materials should not be labeled as "meat." This is unacceptable. Consumers should not be exposed to spinal and nervous system materials in their food no matter how it is labeled.
- Ban the presence of specified risk materials from animals of *any* age from human consumption. The fact that "specified risk material" from animals over the age of 30 months would be deemed unfit for human consumption is progress, but does not go far enough.
- Maintain the ban on "downer" cattle for slaughter for human consumption. Keeping this higher risk population out of the food supply not only makes sense as a way to prevent BSE, but for humane reasons as well.
- Ban the feeding of mammalian protein to mammals. E.G. - blood and blood products, gelatin, pure porcine and pure equine protein, and "plain waste" that is, inspected meat products that were cooked and offered for human consumption and then processed for animal feed.
- Ban feeding cattle parts to hogs, chickens, et cetera and the feeding of the hogs, chickens et cetera to cows.
- Ban the feeding of poultry protein; especially chicken litter. The feeding of chicken waste to other animals is unnatural and it raises certain wholesomeness concerns.
- Start a program to test United States cattle for Mad Cow Disease. The cost of testing one hundred percent of America's cattle would only add about six cents per pound to consumer beef prices. A January Poll by Consumers Union found that ninety-five percent of the public would pay ten cents more per pound for tested beef.¹ Testing of cows should start as soon as

1. Hightower, Jim. "BushCo's mad, mad, mad, mad, Mad Cow policy." Hightower Lowdown. April 2004. 3.

possible. Europe tests one of every four cows bound for consumption and Japan tests one hundred percent of theirs.

- Autopsies performed at Yale University and elsewhere have shown that twenty percent of people that were diagnosed with Alzheimer's disease actually died of a similar disease called Creutzfeldt Jakob Disease (CJD). Many of these cases of CJD might have been caused by Mad Cow infected beef that the victims had eaten years before. We cannot know how many people have contracted Mad Cow disease since it can take forty years for Mad Cow symptoms to appear in the eater.²
- Allow the testing of cows by licensed private laboratories.
- Encourage cattle farmers to feed their cattle natural or organic feed.

Sincerely,


Joshua R Pritchett

Parts of this letter are from a sample letter written by Public Citizen. (citizen.org).

2. Hightower, Jim. "BushCo's mad, mad, mad, mad, Mad Cow policy." Hightower Lowdown. April 2004.