March 7, 2001

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U.S. Food and Drug Administration Dockets Management Branch 5630 Fishers Lane, Room 1061 Rockville, MD 20852 FDADockets@oc.fda.gov

To the U.S. food and Drug Administration:

We at the Institute for Food First/Food and Development Policy, which has for years been concerned about the quality of food in our food supply, are strongly urging you to grant Docket # 98P-0151/CPI which would prevent the slaughter of downed animals.

There are a number of reasons we feel this is essential. One, the slaughter of downed animals represents a serious threat to the public's health, due to these animals' increased risk of bacterial contamination and, as is now a real concern, bovine spongiform encephalopathy ("Mad Cow Disease").

Second, the slaughter of downed animals requires their being treated inhumanely. The process of moving a downed animal is cruel, with machines making no modification in the way they are dragged or lifted.

Third, while there is ethical and moral controversy over the imperativeness of treating animals humanely, a pragmatic approach to this situation renders such controversy meaningless. In truth, the slaughter of downed animals is simply unnecessary. Their economic contribution is minimal and, when health risks are taken into consideration, perhaps even negative.

The bottom line is this: The granting of this docket will provide impetus to take care of livestock before they are shipped to slaughterhouses, ensuring that the animals are treated in such a way as to prevent they're being downed in the first place. With the slaughter of animals outright prohibited, the livestock industry will at last have to put its energy in the right direction, toward caring and attending to its animals before injuries occur, both for the animals' sake and that of public health and safety.

We thank you for your attention to this important matter.

Sincerely,

Ormadia Mittal

Anuradha Mittal

Co-director, Food First/Institute for Food and Development Policy

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