

271

FSIS Docket Clerk,
Docket # 03-025IF Room #102
Cotton Annex, 300 12th & C Streets, SW
Washington DC 20250-3700

RECEIVED
FSIS DOCKET ROOM
04 FEB 26 PM 12: 59

Thursday, February 19, 2004

Re: Down Cows and Non Ambulatory

To Whom It May Concern:

The purpose of this letter will be to address the issues associated with the most recent BSE rules and regulations. More specifically the following points will be identified and described in detail as to the effect that will be placed on us personally and our opinion of the overall impact.

A brief description of our facility and business size simply said, we are a small company. Our total annual revenues do not exceed \$1,000,000. We are in the business of custom slaughtering and processing beef, pork and lamb products usually for the consumption of "in home use" or better said "back to the customer" who brought it in to us. We are a USDA Federally inspected plant. One of several that has operated in the state of Missouri since 1964. We willingly came under the USDA inspection program when it became available in the mid 70s.

The overall impact of the latest rules has been estimated to impact or reduce our annual sales no less 70,000.00, while at the same time increase our expenses exponentially to an upward trend due to the increased labor associated with removing spinal cords. The latter being the lesser of our concern. We are in full agreement of a safe food supply.

The most important factor involved from our point of view is issues that deal with BSE. In a rural community of Missouri there are an abundance of livestock. Animals are no different than humans in so far as "stuff happens". Broken legs, tendons, and other issues are going on with these animals that have nothing to do with the safety of the food. We have already this year turned down an enormous amount of this type of business. In every instance, the owner of the animal used the product himself. It was processed in less than desirable conditions as opposed to a facility that was clean and operating under the USDA Inspection system. These animals will not be thrown away. A farmer's mentality of maximizing what it is that they can get from these will never go away.

By not bringing these animals in we then become unaware of what is out there. An analogy used by people in the industry is "If you are pregnant, or know someone that is, it's going to show up some day, whether you like it or not". By not testing these animals, the general attitude that is being stated is "we really don't want to know what it out there". We are asking that the animals be allowed to be brought in, looked at and testing to be conducted on some sort of regimented scale.

It is our opinion that in some cases that the farmers will do nothing with these animals besides push them into a ditch. Is this really a safe alternative to the environment? To other wildlife? It is then our position that this ruling has pushed back the time of federal inspection to the mid sixties. People are being encouraged to farm kill, salvage and do it in an environment that is less than satisfactory or even close to the standards that are being used in and with the federal inspection program. There are no ecoli, salmonella, inspection, preventative measures what so ever.

Therefore, I sum the points that are made and the impact that this will have, food safety to farmers and to those who receive the products of "farm slaughtered animal" financially and environmentally.

These are all sound reasons to have and to allow down animal into our facilities.

A handwritten signature in black ink that reads "Edward E. Dent". The signature is written in a cursive style with a prominent, sweeping flourish at the end of the name.

Edward E. Dent
President
The Country Butcher Shop
Palmyra MO 63461
800-272-9223