February 18, 2004



FSIS DOCKET ROOM
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FSIS Docket Clerk Docket 03-025IF Room 102, Cotton Annex 300 12th and C Street SW. Washington, DC 20250-3700

RE: Docket No. 03-025IF/ Non-ambulatory Animal Ban

To Whom It May Concern:

Thank you for implementing a temporary ban on non-ambulatory cattle from entering the food chain as a protection against Bovine Spongiform Encephalopathy (BSE).

I am respectfully urging you now to make this ban permanent, and include all livestock, not just non-ambulatory cattle. There are many brain diseases inflicting animals (BSE is just one of them), such as chronic wasting disease in deer and elk and scrapie in sheep and numerous cases in the US alone, which would warrant such a decision.

The search for more cases of BSE has now ended, even though the additional suspected animals have not been found. Therefore, officials cannot be sure that all of America's 95 million cattle are free from this disease. Very little is known about BSE and the US should institute the same standards as other countries in the world to ensure beef supply safety.

The testing of all cattle is absolutely necessary. Non-ambulatory animals have been found to be 49 times more likely to be infected with BSE than ambulatory animals. Signs of impairment are not always evident and insufficient testing methods may not show any illness right away. No chances should be taken with BSE.

Animal scientist and industry consultant Temple Grandin states that 90% of non-ambulatory cases are preventable. Passing this legislation and making this ban permanent would not only be safer for the consumer, but would also entice anyone involved in managing livestock to treat animals with better care, so they don't become "downers", who are not able to move on their own and have to be dragged with chains or pushed with bulldozers, while fully conscious, into a slaughterhouse to be killed.

To reduce this kind of suffering, a stipulation should also be included to require the immediate humane euthanization of all non-ambulatory animals.

Sincerely, Ursula Pelka

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