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February 18, 2004

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

Dear Secretary Veneman:

I am writing to thank you for banning the slaughter of downed cows for human consumption and urge you to disallow any weakening changes to the interpretation of downers.

In addition, I urge you to immediately impose a ban on the processing of *all* downed farm animals for human consumption - not just cows. Please include sheep, pigs and other livestock as well.

As you know, once non-ambulatory, these animals cannot be moved humanely, and it is well documented that handlers drag these hapless creatures with chains or push them with bulldozers or forklifts - resulting in undeniable and needless cruelty. This is inexcusable in a civilized society and constitutes one of the most egregious abuses of animals currently permitted in the industrial livestock production system.

The "mad cow" recently found in Canada was a downed animal, prompting the president of the Alberta Beef Producers to remark, "Cows too sick to walk, too sick to stand, have no business being part of the food system. This animal should never have left the farm." In January 2003, USDA wrote in the Federal Register that if BSE does occur in the U.S., it will most likely first be found among downed cattle. According to USDA, downed animals "represent a significant pathway for spread of disease if they are not handled or disposed of with appropriate safeguards."

Therefore, I urge you to impose a permanent ban on the processing of all downed animals for human consumption. The adoption of such an emergency rule will undo some of the damage caused by USDA's ill-advised policy of allowing the processing of downed animals and may prevent future processing of BSE-infected animals for human food.

Sincerely,


Anne L. Vollmerhausen