

FSIS Docket Clerk
Docket 03-025IF
Room 102, Cotton Annex
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Washington, DC 20250-3700

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"Docket No. 03-025IF"

Thank you USDA Secretary Ann Veneman - for banning the slaughter of downed cows for human consumption.

I urge you to hold the line against weakening changes and maintain USDA's interpretation of downers -i.e., all non-ambulatory disabled animals, regardless of the reason they are unable to stand or walk (illness, injury, or a combination).

Please extend the ban to cover any species of downed animals - not just cows, but also pigs, sheep, and other livestock.

Please make policy to require their humane euthanasia.

After the discovery of an animal with "mad cow" disease (aka bovine spongiform encephalopathy, or BSE) in Washington State, the U.S. Department of Agriculture (USDA) adopted a series of new policies to address the crisis.

Most notably for the animals, USDA acted on a long-standing demand of animal protection advocates: it banned the slaughter of any "downed" cattle - those who are too sick or injured to stand or walk on their own - for human food.

Prohibiting downers from being sold for human food means ranchers and everyone else involved in handling livestock will have a financial incentive to treat the animals with greater care so they don't become downers.

While many industry groups have now embraced this ban - to protect food safety and the reputation of their industry, as well as to promote humane treatment -

A segment of the industry and its allies in Congress are suggesting that the USDA downer ban be weakened. These legislators - the very people who thwarted the enactment of a congressional ban on downers and allowed the BSE-positive cow in Washington to enter the food supply -

want to allow those downers who have broken a leg or suffered some other injury to be slaughtered for human consumption.

They want to squeeze every last dollar out of these crippled and hapless animals, subjecting them to being dragged by chains, pushed with bulldozers, or whatever else it

takes to move them to slaughter.

Such a weakening change would gut the newly adopted ban.

USDA has indicated that it's impossible to determine by visual inspection which downers have BSE or to establish why an animal is downed. In fact, the Washington State cow and the first BSE-positive Canadian cow (in 1993) were both believed to be non-ambulatory because of injuries, not illness.

Before signs of neurological impairment become obvious, an animal's ability to walk may well be affected, causing the animal to stumble and break a leg or suffer some other type of physical injury. USDA's policy stipulates that "all non-ambulatory disabled cattle presented for slaughter be condemned."

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Please make policy to require their humane euthanasia.

Sincerely,



Jana Harker

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2-18-04