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GREENCASTLE LIVESTOCK MARKET
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To: FSIS Docket Clerk
03-025 I F
Room 102 Cotton Annex
Washington, DC 20250-3700

From: Greencastle Livestock Market, Inc.
PO Box 86
Greencastle, PA 17225

Subject: Downer Cows

To Whom It May Concern:

I Jeffrey S. Craig, the owner of the Greencastle Livestock Market, Inc., am writing this letter in response to the ban placed on "Downer cows" (reference number "03-025 I F").

The Greencastle Livestock Market, Inc. runs sales twice a week fifty-two weeks a year, and as a result of the sanctions imposed on downers we have been forced to deal with some very untimely economic hardships.

During the calendar year of 2003 the Greencastle Livestock Market handled 40,000 plus head of cattle alone and from these 40,000 plus head we were subjected to animals that went down with "Acute Injuries". By using the words acute injuries I will be referencing animals that go down due to sudden problems such as broken bones, splits, pinched nerves due to birthing, ect. As a result of one of these acute injuries we would be unable to sell the animal through the sale ring due to its inability to ambulate under it's own power thus leaving us with the task of humanly disposing of the animal. The only option we had was to load the animal onto a truck and take it to a local slaughterhouse and have the animal disposed of properly. Due to the fact the animal was down by means of an acute injury there was no sickness involved and the meat could still be used for human consumption thus allowing the entire animal to be used and not wasted. Now with the sanctions that are imposed in regards to downer cows if they cannot walk they cannot be sold and thus have to be put down on site.

This now creates another hardship, how do we put this animal down humanely? As policy stands a veterinarian is called to put this animal down at a cost of \$140.00 per animal. There is also a disposal fee from the rendering company that we use to dispose of these animals and that stands at a cost of \$35.00 per stop this has now upped the total price to dispose of a single animal to \$175.00 and as you can see this projected cost could

become substantial over the course of year not to mention the fact the animal is wasted instead of being used in a way that is beneficial.

In closing I feel that there needs to be a reevaluation of the present policies in effect when it comes to the term "downer cows". There should be provisions incorporated to allow animals with acute injuries to be used in a manner more beneficial to all involved. I would like to thank you for your time in reviewing this letter and also for your consideration in amending this policy.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey S. Craig", with a long horizontal flourish extending to the right.

Jeffrey S. Craig
President / Owner
Greencastle Livestock Market, Inc.