

494



Pennsylvania Association of Meat Processors

P. O. Box 474

Campbelltown, PA 17010-0474

www.pameatprocessors.org

RECEIVED
FSIS DOCKET ROOM

04 APR 12 PM 12:59

Phone: 717-832-1030

FAX: 717-832-2850

PAMP@pameatprocessors.org

April 4, 2004

FSIS Docket Clerk
Docket #03-025IF
102 Cotton Annex
300 12th Street SW
Washington, DC 20250

Dear Sirs/Madames:

The Pennsylvania Association of Meat Processors (PAMP) is a state trade organization which represents nearly 200 small meat and food businesses and their suppliers. The purpose of the group is networking, keeping up with current meat issues and education.

I am writing this letter on behalf of PAMP to protest USDA's compliance issues concerning BSE. A complete ban on downed animals is unjustified. We understand restrictions on cattle that have central nervous system disorders and other illnesses. But the ban should not extend to animals that have injuries such as broken extremities or injuries suffered during birthing. With these latter animals, there is no food safety issue - they just can't walk.

Because they have suffered broken legs or pelvic problems due to birthing, a complete ban policy is not needed. It is having an enormous economic impact on small farmers and our industry. Just because the ban is in effect does not mean the problem of downer cattle will disappear. Farmers will find ways to slaughter their own non-ambulatory animals and locate ready markets for this underground meat. Food safety issues may be compromised under the USDA's current full-ban policy.

PAMP also feels that USDA's position on SRM's (Specified Risk Materials) in cattle +30 months of age is not justified. Specified Risk Materials are the brain, spinal cord, among other things that must be segregated and disposed of to insure that these items are not used for human consumption. USDA wants the backbone completely removed in all cattle over +30 months, that means no T-bones. The Spinal Cord can be discarded without removing the backbone. Removing the backbone from cattle will cost our small companies many needed dollars this year, not to mention the loss of customer satisfaction.

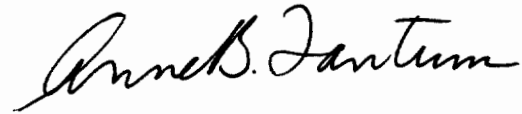
The Department of Agriculture has not proven risk to humans to warrant such action. Based on one case in Washington State, this over reaction by USDA will have an enormous impact on consumers and business alike. This directive should be rescinded, as there is no risk to consumers.

Pennsylvania Assn. of Meat Processors
Page 2

Our small meat processing companies also wish to protest the requirement to get verification letters stating that the supplier followed the USDA meat inspection regulations *when the mark of inspection on a meat product says it has been inspected and passed*. There is no point in a product bearing the mark of inspection if it means nothing.

Small meat and food companies in Pennsylvania - and across the nation - are inundated with heavy-handed government regulations and seemingly spur-of-the-moment decisions. Daily these companies which have served their communities and farm populations, sometimes for generations, become increasingly vulnerable to the same glaring fate that has befallen Pennsylvania's small mining operations and gas stations - extinction.

Sincerely,

A handwritten signature in cursive script that reads "Anne B. Tantum".

Anne B. Tantum
Association Manager

cc: Joe Lunn, President