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FSIS Docket Clerk
Docket 03-0251F
Room 102, Cotton Annex
300 12th and C Street, SW.
Washington, DC 20250-3700

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Please accept comments and concerns for matters addressed in Docket 03-0251F regarding the "Food Safety and Inspection Service" requiring the "Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle."

Since field and laboratory research has shown that clinical signs of BSE cannot always be observed in non-ambulatory animals, and that

Since tissue infected with BSE may contain BSE infectivity even though the diagnostic test, due to limitations in the testing methods, does not indicate that the animal has the disease, and that

Since the agents, known as prions, are not well understood, but are known to be highly resistant to extreme heat, ultraviolet light, ionizing radiation and common disinfectants that normally inactivate viruses and bacteria, and that

Since prions are known to jump the species barrier causing Transmissible Spongiform Encephalopathies in sheep, mice, deer, pigs, cats, humans, mink, cows, ... most likely through the gastro-intestinal vector, and that

Since experts in the field of prion infection have stated that "it has to be in poultry," having eaten "by-pass protein" which consists of Specified Risk Materials (SRMs) in their meal, and that

Since the food safety of animals and the American People is jeopardized by the ingestion of these SRMs and, thusly so, jeopardized by the ingestion of animals fed SRMs, as well as, animal parts supplied to the public that were processed on equipment that was exposed to SRMs, and that

Since a majority of establishments have had difficulty keeping SRMs out of their products, and that

Since the Food Safety Inspection Services has under this Docket authority only to request a voluntary recall, rather than the authority to demand a recall,

Therefore, considering the jeopardy of animals to cruel and callous harm which exists in the realm of malicious malfeasance, and considering the jeopardy of people to organ wasting disease, CJD in addition to the many health related diseases associated with the ingestion of animals and animal products, it is recommended that the measures contained in the "Interim Final Ruling for 9 CFR Parts 309, 310, 311, 318 and 319" be accepted as is. It also strongly recommended that the food safety issue be revisited immediately to further strengthen the regulations disallowing the operation of establishments that place the food safety of animals and people in jeopardy.

Sincerely,



Steven Baer
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