



# CALIFORNIA FARM BUREAU FEDERATION

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NATIONAL AFFAIRS & RESEARCH DIVISION

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Docket Clerk  
U.S. Department of Agriculture, Food Safety and Inspection Service  
300 12<sup>th</sup> Street, SW  
Room 102, Cotton Annex  
Washington, D.C. 20250-3700

RE: REGULATORY INFORMATION NUMBER 0583-AC87

The California Farm Bureau Federation appreciates this opportunity to comment on the Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle Interim Final Rule (*Federal Register*, Vol. 69, No. 67, page 18245).

We support USDA's decision to prohibit from the human food supply non-ambulatory cattle that are presented for commercial slaughter pursuant to the proposed new paragraph (e) of Section 309.3 of 9 CFR Chapter III, "Dead, dying, disabled, or diseased and similar livestock." Aside from the food safety considerations of potentially consuming an unhealthful product in commerce, shipment of non-ambulatory animals for slaughter has welfare ramifications by adding undue stress to an animal in physical distress.

We believe that the USDA-Food Safety and Inspection Service needs to state clearly in policy as to whether on-farm slaughter of a non-ambulatory animal by the animal's owner, the owner's employee(s), and/or a custom slaughterer is legal and, if so, under what parameters. If it is the opinion of USDA that an owner in consultation with a licensed veterinarian should not slaughter on the farm an otherwise "healthy" animal for personal consumption, USDA should cite the science supporting that opinion. A non-ambulatory animal disabled as a result of a condition such as a musculo-skeletal injury or dystocia does not necessarily pose a food safety risk.

Thank you for this opportunity to comment.

Sincerely,

ANNMARIA de GRASSI  
Director, National Affairs and Research

AD:lw

cc: Dick Newpher, AFBF