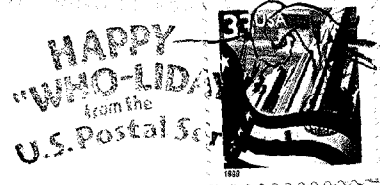




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U.S. Food and Drug Administration
Dockets Management Branch
5630 Fishers Lane, Room 1061
Rockville, MD 20852

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STATE



**HUMANE
ASSOCIATION
OF CALIFORNIA**

Post Office Box 299
Pacific Grove, CA
93950-0299

Phone: (831) 647-8897
Fax: (831) 375-7529
rward@statehumane.org

▪ OFFICERS

President

Madeline Bernstein, Esq.
SPCA Los Angeles

Vice President

Christine B. Beninger
Humane Society of Santa Clara
Valley

Treasurer

B. Robert Timone
Haven Humane Society

▪ DIRECTORS

Joyce George
Humane Society of Ventura
County

Rick L. Johnson
Marin Humane Society

Ronna Kadow
Riverside Humane Society

Steven McNall
Pasadena Humane Society

Norm Minson
Central California S.P.C.A.

Gary A. Templin
Oakland S.P.C.A.

▪ STAFF

Executive Director
Richard Ward

Office Hours
Monday - Friday
9 am - 5 pm

98P-0151

3267 '01 JAN -8 AM 11:22
December 28, 2000

U.S. Food and Drug Administration
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Rockville, MD 20852

Re: Docket #98P-0151/CP1

The State Humane Association of California, which represents over 105 humane societies and SPCA's, animal control agencies and other animal groups across California, wants to urge the Food and Drug Administration to grant petition 98P-0151/CP1 to prohibit the slaughter of downed animals.

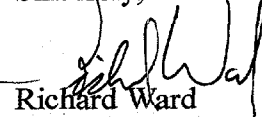
We feel strongly that animals that are too sick or injured even to stand should not be allowed to enter the human food chain. In addition to posing an increased risk for bacterial contamination, there is evidence that some downed animals may be afflicted with a form of BSE (Bovine Spongiform Encephalopathy or "Mad Cow Disease"), a disease that has been linked to a fatal human illness (CJD or Creutzfeldt-Jakob Disease).

Downed animals are frequently dragged to slaughter, or abandoned to die slowly from neglect at stockyards across the country. It is impossible to move downed animals humanely, and they are typically pushed with tractors or dragged with chains - inhumane processes which cause injuries ranging from bruises and abrasions, to broken bones and torn ligaments. This must stop

Downed animals comprise a very small percentage of animals slaughtered, and prohibiting their marketing will cause no undue economic hardship. Industry experts have estimated that 90% percent of downed animals can be prevented with better care and handling. Removing the market for downed animals will surely provide an incentive to industry to prevent downed animals in the first place.

I urge you to do everything possible to see that stockyards stop accepting and selling downed. Thank you.

Sincerely,


Richard Ward
Executive Director

C3281