



ANIMAL PLACE

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U.S. Food and Drug Administration
Dockets Management Branch
5630 Fishers Lane, Room 106 I
Rochille. MD 20852

RE: **Docket # 98P-0151/CP1**

To Whom It May Concern.

I am writing this letter as a veterinarian who is concerned about the use of downed animals (i.e., animals too sick even to stand) for food. The meat inspection system currently in place at U.S. slaughterhouses cannot adequately determine why animals are downed. and, therefore, cannot adequately detect potential hazards in meat derived from these animals. I believe this poses a serious threat to human health.

In recent decades. the prevalence of bovine leukemia virus and other diseases has increased in U.S. cattle. Meanw hile, there is the possibility that U.S. livestock may be afflicted with their own variant of bovine spongiform encephalopathy (BSE). Instead ofbecoming 'mad' like cows in England, it appears that afflicted cattle in the U.S. become downed.

In England, a fatal human dementia, known as new variant Creutzfeldt-Jakob Disease, has been linked to the consumption of meat from cows infected with BSE. It is possible that U.S. cattle harbor a variant of BSE and could be infecting human consumers. The true risk associated with BSE in the U.S. will not be known for some time as it can take as many as 30 years for the symptoms of transmissible encephalopathies (an area of research in which I specialized for many years) to become evident in human beings. Although BSE has not yet been proven to exist in the U.S.. neither has it proven to be absent. This was the case in England about ten years ago. The consequences of governmental inaction to take appropriate preventive measures is now a matter of public record.

Furthermore, as a practitioner dealing with farmed animals, I remember many instances of cattle or other nonhuman animals who were brought to auction yards and who were unable to get up. They were dragged from one place to another. often by the use of a chain around their neck or a leg. The pain and misery they endured was incredible and unconscionable. Unfortunately, there was little I or anyone else could do about the situation because there were no laws regulating the treatment of cattle, sheep, goats. pigs and others who may end up crippled at auctions, stockyards or slaughterhouses.

The relevant issue nith respect to Docket # 98P-0 15 1/CP1, is that, as long as there is a market for these animals, downed animais will be allowed to suffer unconscionably and tainted meat will be an essentially unavoidable part of the food supply As long as the agencies like the Food and Drug Administration sanction the meat from these animals. the inhumane situation will cont inuc. For these and other reasons, it seems imprudent to allow the slaughter of downed animals for human consumption. I ask. therefore, that you make a rule that downed animals may not be slaughtered for human food.

With reverence for all life,

Nedim C. Buyukmihci. V.M.D.
Director, Animal Place
Professor of Veterinary Medicine, University of California

NCB:ztp

98P-0151

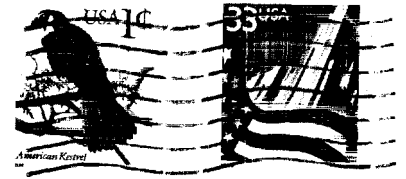
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3448 Laguna Creek Trail

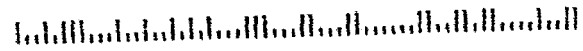
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'Farm' animal refuge and education center



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