

Fax to: U.S. Food & Drug Administration
Dockets Management Branch
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May 11, 2001
12:15 PM MST

From: Carrol McDonald
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RE: DOCKET NUMBER 98P-0151/CP1

This is to request that the FDA grant petition 98P-0151/CP1 to completely prohibit the slaughter of downed animals.

Last year, the USDA announced a landmark policy to stop purchasing meat from "downed" cows for Federal programs, including the National School Lunch Program. This policy recognizes a growing consensus—even among livestock industry and government officials—that the marketing and slaughter of downed animals is unacceptable for the general public.

- Animals who 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 which has been linked to a fatal human illness (CJD or Creutzfeldt-Jakob Disease).
- Downed animals comprise a very small percentage of animals slaughtered, and prohibiting their marketing will cause no undue economic hardship.
- 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 abrasion, to broken bones and torn ligaments.
- 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 provide an incentive to industry to prevent downed animals in the first place.

Granting this petition is in the humane and health interests of every consumer, the industry and our food animals. Please let me know of the FDA's ruling in this matter.

Thank you,

Carrol McDonald

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