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September 29, 2008

Docket No. FSIS-2008-0022  
US Department of Agriculture  
Food Safety and Inspection Service  
Room 2534 South Agriculture Building  
1400 Independence Avenue SW  
Washington, DC 20250

**Re: Docket No. FSIS-2008-0022—Requirements for the Disposition of Cattle that Become Nonambulatory Disabled Following Antemortem Inspection**

Dear Sir/Madam:

We appreciate the opportunity to comment on Docket No. FSIS-2008-0022, in which USDA-FSIS proposes to amend the Federal meat inspection regulations to:

- (1) Remove the provision that states FSIS inspection personnel will determine the disposition of cattle that become nonambulatory disabled after they have passed antemortem inspection on a case-by-case basis, and
- (2) Require that all cattle that are nonambulatory disabled at the time they are presented for ante-mortem inspection at an official establishment, and all those that become nonambulatory disabled after passing antemortem inspection, be condemned and properly disposed of.

After a careful review of the proposed rule as published in the *Federal Register*, the American Veterinary Medical Association (AVMA) recommends it be adopted. Adoption of this rule is consistent with current AVMA policy on the disposition of disabled livestock (see: [www.avma.org/issues/policy/animal\\_welfare/disabled\\_livestock.asp](http://www.avma.org/issues/policy/animal_welfare/disabled_livestock.asp)). In supporting the proposed rule, the AVMA recognizes it will be important for USDA-FSIS to make clear its procedure for determining that an animal is nonambulatory disabled.

The objective of the AVMA is to advance the science and art of veterinary medicine, and the Association has a long-term concern for, and commitment to, the welfare and humane treatment of animals. The AVMA represents more than 77,000 veterinarians and is the recognized voice for the profession in presenting its views to government, academia, agriculture, animal owners, the media, and other concerned members of the public. We appreciate the opportunity to respond.

Sincerely,

W. Ron DeHaven, DVM, MBA  
Chief Executive Officer

AWC/GCG