

**A Review of USDA
Slaughterhouse Records
for Downed Animals
(U.S. District 65 from January, 1999 to June, 2001)**

**A Farm Sanctuary Report
October, 2001**

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Background:

On March 4, 1998, Farm Sanctuary and Michael Baur, a meat consumer, petitioned the United States Department of Agriculture (USDA) to stop allowing meat from animals too sick to stand, so-called “downed” animals, to be used for human food. The petition points out that downed animals are defined as “diseased” by the USDA and that the law explicitly precludes the use of meat from diseased animals in the human food supply. But on March 25, 1999, the USDA sent a letter formally denying the downed animal petition, stating, “The [law], regulations, and past practices clearly provide for the slaughter and processing of diseased animals for human food.”

After receiving the USDA’s denial letter, Farm Sanctuary continued to correspond with the Agency, urging a ban on downed animal slaughter. Some within USDA agreed with Farm Sanctuary, and in the summer of 2000, the USDA instituted a policy precluding the purchase of beef from downed cows for federal food programs, including the National School Lunch Program. However, despite this policy and in spite of industry efforts to remedy the problem, USDA continues to approve downed animal meat in the human food supply, providing an economic incentive for this irresponsible activity to continue.

In the summer of 2001, Farm Sanctuary filed a Freedom of Information Act for all USDA “Suspect Cards,” which describe Ante-Mortem and Post-Mortem Inspections of downed animals, for all USDA establishments in District 65 for 1999, 2000, and 2001. There are a total of 938 facilities listed in U.S. District 65 which encompasses the states of Connecticut, Massachusetts, Maine, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. As of the end of October, the USDA has provided Farm Sanctuary with Suspect Cards for three establishments, while Farm Sanctuary awaits the remainder. This suggests that either a very small percentage of the 938 slaughterhouses in U.S. District 65 slaughter downed animals, or more likely, that slaughterhouses who slaughtered downed animals did not fill out Suspect Cards.

Findings:

The three establishments for which USDA has provided Suspect Cards inspected a total of 5,434 downed animals in 1999 and 2000, and from January to June in 2001. The total number of downed animals passed for human consumption was 3,978 (73%), while the total number condemned was 1,456 (27%). The percentages passed ranged from a low of 25% to a high of 82%, varying between years and facilities, excluding the third facility, which only recorded one downed animal in 1999 and one in 2000. One establishment accounted for 5,306 downed animals, the vast majority of the total of 5,434. The second accounted for 126 downed animals, and the third accounted for only two downed animals. (TABLE 1)

All Suspect Cards were reviewed and the condition and disposition (including whether or not the animals were passed for human food or condemned) was tallied and summarized. Although the writing on these cards was often difficult to read, sometimes to the point of illegibility, words and phrases appeared with enough frequency to allow conclusions to be drawn. A handful of Suspect Cards listed other species (i.e. pigs and sheep), but this report only represents cattle, by far the most prevalent species listed. The majority of suspect animals were female Holstein cows, indicating that most downed animals are by-products of the dairy industry.

Of the downed animals passed for human food, the most commonly listed condition was “injured.” There are concerns that this vague description is noted, and the animal passed for human consumption, without an adequate investigation into the animal’s condition. Former USDA veterinarian Dr. Lester Friedlander stated, “The USDA does not adequately inspect downed livestock, and describing a suspect animal’s condition simply as ‘injured’ is a prime example of the Agency’s lacking concern and inadequate inspection practices. Injury can mean practically anything, and it is not an acceptable description for inspection purposes.”

At the plant where 5,306 downed animals were inspected, 3,910 were passed for human food, and 2,132 of these were described simply as “injured.” Between 1999 and 2000, the percentage of downed animals who were passed for human food at this facility increased from 63% to 82%. During the same time period, the percentage of downed animals described as “injured” increased. In 1999, 45% of those passed were “injured,” and in 2000, 69% of those passed were “injured.” This correlation suggests that the term “injured” was used in an arbitrary manner, and that its increased application in 2000 contributed to a greater percentage of downed animals who were passed for human consumption in that year. (TABLES 2-A, 2-B, 2-C)

Besides injuries, downed animals who were passed for human food suffered from various maladies, including abscesses, mastitis, gangrene, malignant lymphoma, and pneumonia. Animals with these diseases were also condemned for human food purposes, as were animals described as DOA (i.e. dead on arrival), moribund, CNS (i.e. central nervous system disorder), and with dozens of other descriptions. Over 100 of the Suspect Cards’ descriptions were either illegible or blank. (TABLES 2-A, 2-B, 2-C)

In addition to the Suspect Cards, Farm Sanctuary also requested and received Daily Disposition Sheets from USDA for the three establishments for which Suspect Cards were obtained, along with Daily Disposition Sheets for another fourteen slaughterhouses in U.S. District 65. Animals with various diseases were passed for human food, and a list of 37 diseases found on the Suspect Cards and Daily Disposition Sheets was compiled in a list. (TABLE 3)

Comparing records from the suspect cards and disposition sheets uncovered serious mistakes and discrepancies. On more than one occasion, the same animal who was recorded as “passed” for human food on one document, was listed as “condemned” for human food on another.

Conclusion:

The inspection and slaughter of downed animals for human food poses various risks to human consumers, and the practice has also been widely criticized as inhumane. Inspections of suspect animals are poorly executed and records are poorly maintained. In many instances, USDA’s slaughterhouse records are illegible, and their accuracy is questionable. Even USDA records that are filled out do not provide adequate data about the animals’ health or their potential threat to human consumers.

TABLE 1

Downed animals passed and condemned by establishment and year

	Total	Pass	Condemn
Establishment 1			
1999	2,188	1,382 (63%)	806 (37%)
2000	1,926	1,579 (82%)	347 (18%)
2001 (Jan to June)	1,192	949 (80%)	243 (20%)
Establishment 2			
2000	20	5 (25%)	15 (75%)
2001 (Jan to June)	106	62 (58%)	44 (42%)
Establishment 3			
1999	1	1 (100%)	0 (0%)
2000	1	0 (0%)	1 (100%)
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TOTAL:	5,434	3,978 (73%)	1,456 (27%)

TABLE 2-A

Total suspect animals killed in 1999 at establishment one, including description of the animals' condition and whether they were passed or condemned for use in human food.

Total suspect animals killed:

2,188

Total suspect animals passed for human food:

1,382 (63%)

Total suspect animals condemned for food:

806 (37%)

Totals suspect animals passed by description:

Injuries: 622
Bruising: 96
Abscesses: 85
Split: 316
Mastitis: 66
Torsion: 3
Pneumonia: 17
Peritonitis: 20
Pericarditis: 9
Arthritis: 7
Malignant lymphoma: 1
Neurofibroma: 7
Illegible: 13
Blank: 29

Total suspect animals condemned by description:

DOA: 90
Bruising: 1
Abscesses: 93
Mastitis: 10
Peritonitis: 36
Malignant lymphoma: 72
Icterus: 110
Arthritis: 23
Congested Carcass: 139
Pneumonia: 16
CNS: 4
Gangrene: 29
Endocarditis: 13
Edema: 4
Illegible: 52
Blank: 6
Moribund: 3
Hemorrhage: 6
Lymphoma: 3
Emaciation: 4
Septicemia: 11
Toxemia: 1
Tumors: 2

TABLE 2-B

Total suspect animals killed in 2000 at establishment one, including description of the animals' condition and whether they were passed or condemned for use in human food.

Total suspect animals killed:

1,926

Total suspect animals passed for human food:

1,579 (82%)

Total suspect animals condemned for food:

347 (18%)

Totals suspect animals passed by description:

Injuries: 1,092
Bruising: 48
Abscesses: 29
Split: 397
Mastitis: 48
Pneumonia: 9
Peritonitis: 9
Pericarditis: 6
Arthritis: 14
Malignant lymphoma: 1
Neurofibroma: 5
Hardware: 4
Spinal Hemorrhage: 1
Hemorrhage: 3
Illegible: 21

Total suspect animals condemned by description:

DOA: 62
Bruising: 1
Abscesses: 61
Mastitis: 8
Peritonitis: 3
Malignant lymphoma: 51
Icterus: 1
Pneumonia: 15
CNS: 6
Gangrene: 19
Lymphoma: 63
Hemorrhage: 13
Pyemia: 1
Hardware: 1
Neurofibroma: 3
Muscle Degeneration: 2
Emaciation: 1
Septicemia: 4
Illegible: 14
Blank: 6

TABLE 2-C

Total suspect animals killed from January to June, 2001 at establishment one, including description of the animals' condition and whether they were passed or condemned for use in human food.

Total suspect animals killed:

1,192

Total suspect animals passed for human food:

949 (80%)

Total suspect animals condemned for food:

243 (20%)

Totals suspect animals passed by description:

Injuries: 418
Bruising: 17
Abscesses: 39
Split: 317
Mastitis: 50
Torsion: 4
Pneumonia: 14
Peritonitis: 9
Pericarditis: 4
Arthritis: 3
Malignant lymphoma: 4
Neurofibroma: 5
Gangrene: 2
Illegible: 42
Blank: 19

Total suspect animals condemned by description:

DOA: 51
Abscesses: 28
Mastitis: 7
Peritonitis: 2
Malignant lymphoma: 45
Icterus: 1
Congested Carcass: 31
Pneumonia: 4
CNS: 1
Gangrene: 10
Toxemia: 1
Hypothermia: 1
Moribund: 7
Illegible: 50
Blank: 2

TABLE 3

USDA Suspect Cards and Daily Disposition Sheets obtained by Farm Sanctuary through the Freedom of Information Act indicate that cattle with the following diseases have been approved by USDA for use in the human food supply:

1. Abcesses
2. Actinobacillosis: The disease commonly referred to as “woody tongue.”
3. Actinomycosis: An infection caused by certain actinomyetes, may result in bony degeneration of the jaw, and abcesses in the lungs, intestines, etc.
4. Arthritis
5. Bruising
6. Chronic Pneumonia: (see pneumonia)
7. Congested Spleen
8. Conjunctivitis: Inflammation of the conjunctiva (the mucous membrane lining the inner surface of the eyelids and covering the front part of the eyeball.)
9. Cysticercosis: Cysts in tissues form the lumps that define cysticercosis. If these worms are found in the intestine, they cause a different disease that is called “teniasis.”
10. Cystitis: Inflammation of the urinary bladder.
11. Edema: An abnormal accumulation of fluid in cells, tissues, or cavities of the body.
12. Endocarditis: Infection of the heart valves and parts of the inside lining of the heart muscle (known as the "endocardium").
13. Enteritis: Inflammation of the intestine, especially small intestine.
14. Epithelioma: Tumor composed mostly of epithelial cells; former term for malignant skin tumor.
15. Gangrene: The decay of tissue in a part of the body when the blood supply is obstructed.
16. Gastritis: Inflammation of the stomach’s lining.
17. Gastroenteritis: Inflammation of the stomach and intestines.
18. Granulomatous : A firm, tumor-like granulation formed as a reaction to chronic inflammation., as from foreign bodies, bacteria, etc...
19. Hematoma: Much like a blood clot.
20. Hemorrhage: The escape of large quantities of blood from a blood vessel.
21. Hepatitis: Inflammation of liver, often accompanied by jaundice and fever.
22. Injury
23. Ischemia: A lack of blood supply in an organ or tissue.
24. Malignant lymphoma
25. Mastitis: Inflammation of the udder.
26. Metritis: Inflammation of the uterus.
27. Neoplasms: An abnormal growth of tissue, as a tumor
28. Nephritis: Acute or chronic disease of the kidneys, characterized by inflammation, degeneration & fibrosis.
29. Neurofibroma: A tumor that consists of nerve fibers and connective tissues, caused by an abnormal proliferation of Schwann cells.
30. Pericarditis: Inflammation of the sac that surrounds the heart.
31. Peritonitis : Inflammation of the of the transparent serous membrane lining to the abdominal cavity (which covers the visceral organs).

32. Pneumonia: Inflammation or infection of the alveoli of the lungs of varying degrees and severity; caused by bacteria, virus, etc.
33. Pyometra: An abscessed, pus-filled infected uterus. Toxins and bacteria leak across the uterine walls and into the bloodstream causing life-threatening toxic effects; without treatment death is inevitable.
34. Reticulitis: “Hardware disease”—the ingestion of sharp metal objects, puncturing the reticulum.
35. Spinal Hemorrhage: (see “hemorrhage”)
36. Split: The term referring to an animal whose back legs have “split.”
37. Torsion: A condition in which a part of the body, often a blood-supplying tube, is twisted, restricting blood-flow and ultimately causing the destruction of the effected organ(s).