



PETA

PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

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Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
300 12th St. S.W.
Rm. 102, Cotton Annex
Washington, DC 20250

Re: Docket No. 04-026N

To Whom It May Concern:

On behalf of People for the Ethical Treatment of Animals (PETA), the Association of Veterinarians for Animal Rights, Compassion Over Killing, and United Poultry Concerns, and our more than 1 million members and supporters, we urge the FSIS to make controlled-atmosphere killing (CAK) a part of compliance guidelines in its efforts to reduce salmonella in poultry products. Requiring or encouraging the use of CAK at poultry slaughter facilities would eliminate the problem of fecal contamination that's endemic in the hanging, stunning, and scalding of live birds as well as eliminate the contamination resulting from animal abuse among workers, all of which contribute to unacceptable levels of salmonella.

Current slaughter methods facilitate the spread of salmonella. When hung on the kill line, a bird often will defecate, and then salmonella-carrying feces can get onto the bird's own body, onto the birds below, and onto workers. The workers, in turn, spread the feces from one bird to the next as they force birds into shackles on lines that speed by at 140 birds a minute. The feces spread further by polluting the water in the stun bath and in the scalding tanks, into which all the birds are dunked. During stunning, many birds will swallow this water. Moreover, according to USDA statistics, millions of birds are submerged in the scalding tanks while still alive, and these birds can defecate in the tanks while they drown. Also, the handling of billions of live birds by workers inevitably results in incidents of intentional cruelty to animals. For example, a PETA undercover investigator at a Pilgrim's Pride chicken processing plant in Moorefield, W.V., filmed workers who were squeezing live chickens until feces were expelled from their rectums and directing the stream of feces into the eyes of other chickens.

All these causes of salmonella contamination can be eliminated by using CAK. In CAK, oxygen in the air is replaced with a gas to induce anoxia, rendering birds painlessly unconscious and then dead before they are hung on the line. This eliminates all the problems associated with hanging, stunning, and scalding live birds. CAK is used in many poultry slaughter facilities in Europe and is less expensive than current methods of slaughter. It is also more humane, with Dr. Ian Duncan, one of the leading experts in poultry welfare, calling it "the most stress-free, humane method of killing poultry ever developed."

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THE RIGHTS OF ALL ANIMALS

The science is unclear on how much contamination is introduced during slaughter and how much is introduced on the farm. Nevertheless, CAK would contribute to consumer safety and animal welfare at a cost savings to poultry processors and should be a part of any comprehensive, effective effort to address salmonella contamination.

Sincerely,

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