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From: Noam Mohr [mailto:NoamM@peta.org]
Sent: Wednesday, December 07, 2005 5:13 PM
To: FSIS RegulationsComments
Subject: Docket No. 04-033P

December 8, 2005

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. 04-033P

To Whom It May Concern:

On behalf of People for the Ethical Treatment of Animals (PETA) and our more than 850,000 members and supporters, I urge the FSIS not to allow slaughter establishments that perform J-type cuts to increase their line speeds. Faster line speeds will result in a great deal of additional suffering to birds during shackling.

Although the USDA enforces the Humane Methods of Slaughter Act with regard to many other animals, turkeys continue to be shackled while still conscious. Injuries inflicted during the process of shackling therefore result in intense suffering. Scientific studies have shown that the process of grabbing birds and snapping their legs into shackles causes both psychological and physical suffering, including broken bones. For example, a study of bird shackling by Gregory and Wilkins found that after shackling, 3 percent of broilers had broken bones and 4.5 percent had dislocations. Although the study involved chickens, the shackling process is essentially the same for turkeys—in fact, because turkeys are much larger than chickens, they will likely experience greater injuries. Another study by the same authors found a 44 percent increase in newly broken bones following shackling. Leg injuries are exacerbated for turkeys, whose legs must support bodies that have been intentionally made to grow at nearly twice their natural rate.

Breeding turkeys for such an unnatural size makes them particularly susceptible to leg injuries during shackling. Their massive body weight, along with the unsanitary conditions in modern farms, results in a high rate of skeletal abnormalities and lameness that leave the bones in their legs weak and prone to further injury.

Faster line speeds require workers to snap birds' legs into shackles more rapidly. As a result, workers grab the birds more roughly and snap their legs into shackles more violently. This will lead to a higher rate of severely painful injuries. Any changes in regulations must consider these serious animal welfare implications. With injury rates already high for turkeys, there is no justification for exacerbating the problem. Increasing the line speeds without implementing

measures for preventing the attendant increases in animal injury rates is both irresponsible and unwarranted.

Sincerely,

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