

From: Noam Mohr [NoamM@peta.org]
Sent: Monday, October 09, 2006 3:23 PM
To: Risk Based Inspection
Subject: PETA Comments on Risk-Based Inspection Meeting, Oct 10-11
October 9, 2006

On October 10 and 11, 2006, the Food Safety and Inspection Service (FSIS) will hold a public meeting to review and discuss issues relating to a risk-based inspection system. On behalf of People for the Ethical Treatment of Animals (PETA) and our 1.1 million members and supporters, I ask that humane handling and slaughter issues be covered by these meetings, particularly with regard to chickens and turkeys.

The U.S. Department of Agriculture (USDA) chooses not to protect chickens or turkeys when enforcing the Humane Methods of Slaughter Act. However, on September 28, 2005, FSIS issued a notice (“the FSIS Notice”) regarding the humane handling of birds prior to slaughter:

[U]nder the Poultry Products Inspection Act (PPIA) and Agency regulations, live poultry must be handled in a manner that is consistent with good commercial practices, which means they should be treated humanely. . . . FSIS considers humane methods of handling animals and humane slaughter operations a high priority and takes seriously any violations of applicable laws and regulations.

Ensuring humane handling of animals is not only an ethical imperative; it is also a food safety one. The FSIS Notice states, “[P]oultry products are more likely to be adulterated if, among other circumstances, they are produced from birds that have not been treated humanely, because such birds are more likely to be bruised or to die other than by slaughter.” Any risk-based approach to inspecting slaughter facilities must therefore include a focus on risks to the welfare of the animals involved.

Unfortunately, we have not seen evidence of any improvements in routine mistreatment of poultry as a result of the FSIS Notice and feel that this issue needs to be addressed urgently by federal inspectors. Here are a few examples:

- The PPIA clearly states that birds must be “slaughtered . . . in a manner that results in thorough bleeding of the poultry carcass, and ensures that breathing has stopped before scalding.” However, because of inadequate enforcement, the USDA continues to document millions of birds each year killed by drowning in the scalding-hot water of defeathering tanks. Being drowned in scalding-hot water is clearly a horribly painful way to die.
- Rough handling of birds during shackling is well documented, and studies show that large

numbers of birds suffer bruising and broken bones during this process. For example, Gregory and Wilkins found that after shackling, 3 percent of broilers had broken bones and 4.5 percent had dislocations. Of the 10 billion birds slaughtered in the United States each year, this amounts to hundreds of millions of animals subjected to extremely inhumane treatment, largely as a result of plants' decision to sacrifice humane treatment in the interest of achieving faster line speeds without increasing the number of workers.

- Every time PETA has investigated a poultry slaughterhouse, it has documented routine and extreme mistreatment of animals. For example, an undercover investigation of a Pilgrim's Pride plant in Moorefield, W.Va., in 2004 documented workers who were tearing live birds' heads off, spitting tobacco into their eyes, spray-painting their faces, slamming them against walls, and worse. Another investigation released in 2005 of a Tyson slaughterhouse in Heflin, Ala., documented conscious birds whose faces and bodies were being mutilated by a mechanical blade, whose heads were being ripped off by workers, and who were being scalded alive. Most recently, a 2006 investigation at a Butterball slaughterhouse in Ozark, Ark., documented workers who were stomping on live birds, slamming them into metal trailers and handrails, and using them as punching bags; one bird was even sexually assaulted.

These do not appear to be isolated incidents, nor have they come to an end as a result of the FSIS Notice. The FSIS must come up with a comprehensive approach to putting an end to these abuses.

If, in fact, "FSIS considers humane methods of handling animals and humane slaughter operations a high priority," then I urge you to address these and other serious welfare violations as part of your discussion of risk-based assessments.

Sincerely,

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