

Viva!

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Dockets Management Branch
Food and Drug Administration
5630 Fishers Ln., Rm. 1061
Rockville, MD 20852

June 19, 2003

To Whom It May Concern:

I am writing in support of Compassion Over Killing's petition regarding false and misleading advertising on egg cartons. The petition was filed on June 13, 2003, and is docket number 2003P-0270/CP1.

Egg producers across the country are labeling their cartons with an "Animal Care Certified" logo, misleading consumers that hens laying "Animal Care Certified" eggs are well-treated. In fact, these hens are kept in tiny wire cages so small they cannot even flap their wings. They never see sunlight, let alone go outdoors, never touch earth, and are prevented from engaging in all types of natural behaviors such as nesting, dust-bathing, foraging, and roosting. Additionally, these birds may have parts of their beaks seared off with a hot blade—without painkillers—in order to reduce the impact of the stress-induced aggression that occurs when birds are intensively confined together. As well, they may have food withheld from them up to the point where they have lost 30 percent of their weight in order to jolt their bodies into a new laying cycle.

Referring to the egg industry's guidelines for the "Animal Care Certified" program, the Humane Society of the United States asserts: "The United Egg Producers is not tackling the systematic abuses within the industry that severely compromise the welfare of individual birds. ... [The UEP guidelines] seem designed more to mollify consumers than to address the extreme animal welfare abuses that have become the norm in this industry." (HSUS press release entitled, "HSUS Says Egg Industry Guidelines Don't Go Far Enough," June 27, 2002, [http://www.hsus.org/ace/14515/.](http://www.hsus.org/ace/14515/))

This emphasis on the supposed "humane" treatment of the hens ignores the facts: not only are they treated without compassion or care during their lives, mere egg-laying machines for the industry, but as soon as their productivity diminishes, they are heartlessly slaughtered.

The FDA must take action against the United Egg Producers and prohibit its members from using the "Animal Care Certified" logo on their egg cartons. Using this label shows care neither for animals nor consumers.

Sincerely,



lauren Ornelas
US Campaigns Director

03P-0270

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