



United Poultry Concerns, Inc.

P.O. Box 150, Machipongo, Virginia 23405-0150

Phone: 757-678-7875 • Fax: 757-678-5070

Web Site: www.upc-online.org

RECEIVED
FSIS DOCKET ROOM
05 NOV -7 PM 9:46

October 25, 2005

Docket Clerk
U.S. Department of Agriculture
FSIS
300 12th St SW Room 102 Cotton Annex
Washington DC 20250

04-037N
04-037N-11
Karen Davis

Docket No. 04-037N **Treatment of Live Poultry Before Slaughter**

United Poultry Concerns is a nonprofit organization that addresses the treatment of domestic fowl in food production, science, education, entertainment, and human companionship situations and promotes the compassionate and respectful treatment of domestic fowl.

United Poultry Concerns takes this opportunity to provide the following recommendations in response to your call for comments.

Treatment of Live Poultry Before Slaughter

- If hand-catching is used, birds should be caught and held by both legs to reduce injuries and pain.
- Untrained individuals should not be permitted to operate catching machines.
- Doors of cages, crates, drawers, etc. should be wide and high enough to avoid injury to birds
- Compartments in which birds are to be transported should be deep and wide enough to reduce the suffering and injuries of birds.
- Specific measurements to fit birds of standard weights should be established and required.
- Catching machines should be constructed and operated so as not to sweep up floor litter along with the birds.
- Corral gates should not be used and birds should not be swung up to loaders on a truck to be put into cages.
- Transport and holding-dock time should be no more than 6 (six) total hours.
- Catching, transport, and preslaughter holding systems should be integrated with an automated catching machine placing birds in crates. Modules of crates should be placed on environmentally-controlled trucks, and the crates should be conveyed straight into a mixed-gas-stun/kill unit at the slaughter plant.

Slaughter

- **Electrical immobilization including water-bath “stun” cabinets and handheld stunners should be prohibited. Electrical “stunning” is intrinsically cruel and cannot be regulated.**
- Conscious birds should not be hung upside down in shackles.
- Both carotid arteries should be quickly severed to prevent oxygenated blood from continuing to enter the brain.
- Cutting only the jugular veins should be prohibited.
- Gas stunning/killing using pure CO2 should be prohibited.
- Birds should be stun/killed in the transport crates with a mixture of 90% argon, 2% oxygen, and 8% nitrogen.
- Residual oxygen should be maintained at less than 2% to ensure rapid brain function loss, as air trapped between birds or crates or in the feathers can raise the residual oxygen to levels that prevent loss of consciousness.
- Birds should be killed, not merely stunned, by the gas mixture, because if birds are only stunned rather than killed, they regain consciousness rapidly.
- Slaughterhouse workers should be trained and overseen by specially-trained veterinarians throughout the slaughter process.
- Use of 30% oxygen and 40% CO2 should be prohibited because this mixture prolongs the time taken for birds to become unconscious.
- Live birds should not be dumped in scalding tanks.
- Conscious birds should not have their legs cut off to fit shackles as has been reported in the United States when spent “broiler” breeder flocks are sent to plants designed for slaughtering baby (“meat-type”) birds.
- Spent fowl should be stun/killed with a gas mixture the same as young birds.

Thank you for your attention to the recommendations of United Poultry Concerns regarding treatment of live poultry before slaughter and beyond. Please do not hesitate to contact United Poultry Concerns for additional information and assistance at 757/678-7875.

Sincerely,



Karen Davis, PhD
President

United Poultry Concerns, Inc.
PO Box 150
Machipongo, Virginia USA 23405
Phone: 757-678-7875
Fax: 757-678-5070
Email: Karen@UPC-online.org

United Poultry Concerns is a nonprofit organization that promotes the compassionate and respectful treatment of domestic fowl. www.upc-online.org