



ANIMAL WELFARE INSTITUTE

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October 27, 2005

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Docket Clerk
US Department of Agriculture
Food Safety and Inspection Service
300 12th Street, SW
Room 102 Cotton Annex
Washington, DC 20250

04-037N
04-037N-13
Cathy Liss

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To Whom It May Concern:

On behalf of the Animal Welfare Institute (AWI), I am submitting comments in response to the September 28, 2005 notice entitled, "Treatment of Live Poultry Before Slaughter." AWI urges the US Department of Agriculture (USDA) to ensure the highest welfare standards for the live poultry it inspects.

As an educational non-profit organization with the goal of reducing pain and fear inflicted on animals by humans, we produce husbandry standards for animals raised for food that ensure each species is able to express natural behaviors and enjoy life. In the slaughter process, we require that animals be provided a merciful transport and death.

Hundreds of humane family farmers adhere to our standards. We also work with food retailers, including Whole Foods Market and McDonald's, to help develop programs that improve the lives of animals raised for human consumption for sale in their markets. AWI representatives have witnessed poultry and other animal slaughter first hand; we are aware of the urgent need for the USDA to issue humane slaughter requirements for the billions of birds now subjected to terrifying and painful deaths at USDA-inspected slaughterhouses.

USDA poultry slaughter standards should require the following:

A) No person shall cause or permit a bird to sustain any avoidable excitement, pain or suffering. Any person involved in any part of the killing or slaughter process, including movement of the birds, must be properly trained to acquire the knowledge and skill needed to perform those tasks humanely and efficiently.

B) Any bird experiencing pain or suffering during transport or following arrival at the slaughterhouse must be euthanized immediately upon arrival at the slaughterhouse.

C) After transport, birds should be killed as soon as they arrive at the slaughterhouse. They should be handled as little as possible up to the point of slaughter, and should be carried one at a time in the upright position.

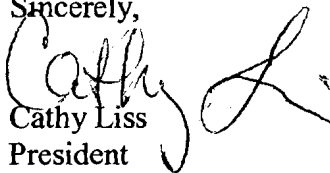
D) Electrical stunning methods in use today cause severe pain and distress in the process of unloading, shackling and hanging the birds. Therefore, Controlled Atmosphere Killing (CAK)¹, in which birds remain in their crates and their oxygen is slowly replaced by an inert gas mixture, is highly preferred. This method ensures chickens are slaughtered without additional suffering, and they die earlier on in the handling process. Irrespective of the method, provisions must be made to ensure that birds are not alive when submerged in scalding water for de-feathering; CAK ensures they are already dead at this point.

E) When unloading of containers of birds from transport trucks is necessary, the containers should be unloaded horizontally and should be handled with care to ensure they are not dropped, thrown or knocked over.

We hope the USDA will adopt a policy that prevents animals from suffering unnecessarily and prohibits cruelty from being practiced in plants that issue "USDA-Approved" labels on their poultry. Please let us know if we can be of any assistance in the standard setting process.

Sincerely,

Cathy Liss
President

A handwritten signature in black ink, appearing to read "Cathy Liss", with a large, stylized flourish extending to the right.

¹ Raj ABM, "Welfare during stunning and slaughter of poultry." *Poultry Science* 77: 1815-9.