3

04-037N 04-037N-3 Eileen Hanrahan

8585 Enochs Dr. Lorton, VA 22079 October 11, 2005

Docket Clerk U.S. Department of Agriculture Food Safety and Inspection Service 300 12<sup>th</sup> Street, SW, Room 102 Washington, DC 20250

Re: Docket No. 04-037N, Treatment of Live Poultry Before Slaughter

## Dear Madam/Sir:

I am writing in support of the notice issued by the Food Safety and Inspection Service in the Federal Register on September 28, 2005, regarding the handling of live poultry before slaughter. The Notice is an important step in the right direction. I commend FSIS for recognizing the importance of humane handling to the safety of the Nation's food supply as well as the legitimate, significant concerns of many individuals and organizations about the moral and ethical implications of certain practices in the food industry.

In recent years, a great deal of information about inhumane slaughter practices has become more readily available and is deeply troubling. Having myself viewed videos and read descriptions of instances of very disturbing animal cruelty reported by reputable organizations, I limited -- and later eliminated -- my consumption of meat. Fortunately for me, the food industry now offers many tasteful products to compete with and take the place of meat in one's diet.

I am particularly encouraged by your proposal of a "systematic approach" by which a poultry operation may assess and improve handling and slaughter practices. I offer the following comments for your consideration.

First, some terms, particularly terms contained in the factors that comprise the first step of the approach, addressing, for example, adequacy and appropriateness, are ambiguous and would benefit from clarification.

Second, the discussion of the second step of the approach falls far short in directing and amplifying the steps to be taken as set out above in the notice. The discussion should specify steps that should be taken in response to the assessment.

PECENTE POOM
PECENTE POOM
PS DOT 19 IM 3:52

## Page 2

Third, the discussion of the third step similarly should direct actions to be taken in response to evaluations of methods that poultry operations undertake.

Finally, and most important, the content of the notice is sufficiently important that the substance should be contained in Federal regulations and not simply a Federal notice. As the Nation's farming and slaughter practices have become more concentrated and large-scale, concerns about food safety and humane handling similarly are more wide scale. To adequately address these concerns, such a regulation should not simply suggest a systematic approach but require a systematic approach and establish steps that FSIS will take to achieve compliance in appropriate circumstances.

Thank you for considering my views.

Sincerely,

Eileen Hanrahan

Ede Kum