

27 October 2005

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Docket Clerk
Food Safety and Inspection Service 04-037N
U.S. Department of Agriculture 04-037N-5
300 12th Street, SW Michael L. Rybolt
Room 102 Cotton Annex
Washington, DC 20250

Re: Docket No. 04-037N

The comments below are on behalf of the turkey industry in regards to the Food Safety and Inspection Service Docket No. 04-037N "Treatment of Live Poultry before Slaughter" published in the *Federal Register* on September 28, 2005, and signed by you. The National Turkey Federation (NTF) is the advocate for all segments of the U.S. turkey industry, providing services and conducting activities, which increase demand for its members' products, protect and enhances their ability to effectively and profitably provide wholesome, high quality and nutritious turkey products at affordable cost to the consuming public.

The number one priority for the turkey industry is to provide the safest, highest quality products possible. Therefore, it is essential to ensure the wellbeing of the turkeys produced. Turkey slaughter has advanced from the "hands-on" methods of the 19th century to the highly sophisticated, scientifically exact standards of today. Even though poultry is not included in the Humane Slaughter Act, the turkey industry meets the critical provisions of the act. The industry also continues to search for new ways to make the process even better. Research continues into a variety of new processing methods that will serve the industry well into the future.

Whether it is on the farm or in the processing facility, the industry acts responsibly in the raising, breeding, transporting and processing of all turkeys. The turkey industry follows the animal care guidelines established by NTF¹. The industry has long held that appropriate treatment of turkeys is a

¹ *Animal Care Guidelines for the Production of Turkeys*. National Turkey Federation (http://www.eatturkey.com/foodsrv/pdf/NTF_animal_care.pdf)

necessary part of production and in fact, national guidelines have been in place in the industry since the late 1980s.

The most recent edition of the guidelines, developed by leading turkey industry experts, have been scientifically reviewed and approved by numerous third-parties. Not only have the NTF Turkey Health and Welfare and the Live Production Committees carefully examined the NTF *Animal Care Guidelines* and determined that they are feasible and based on sound science, but the committees felt it was necessary that the Federation's Board of Directors endorse the guidelines and recommend that the industry follow them. In addition, the committees sought scientific reviews from two third-party organizations: the Federation of Animal Science Societies (FASS) and the American Association of Avian Pathologists (AAAP). Both FASS and AAAP praised the NTF guidelines as well written and noted that they should serve as a model program for the industry.

Not only do all producers and processors recognize that preserving animal wellbeing is fundamentally the right thing to do, it is also in the economic interest of our industry to not mistreat animals. Humane treatment of animals is crucial to the industry's profitability. Research has shown birds subjected to stresses such as poor ventilation, disease, crowding and heat do not gain as much weight or utilize feed as efficiently as their less-stressed counterparts. For an industry that operates on extremely close margins, it is imperative for production systems to be mindful of the animal care concerns to maximize profitability.

Additionally, the NTF guidelines incorporate an audit checklist for establishments to utilize in determining areas of concern when handling live turkeys. The industry is currently undergoing various third-party audits with several auditing firms, including the USDA's Agriculture Marketing Services (AMS). Such audits provide turkey processors a critical evaluation of how well they are adhering to NTF's *Animal Care Guidelines*.

As you can see, the commercial turkey industry has for many years complied with appropriate animal handling standards. The industry feels the NTF guidelines are most appropriate and are committed to ensuring the health and well being of their turkey flocks, which ultimately requires maintaining strict animal care and welfare standards. The guidelines were developed and are periodically reviewed and updated by leading industry turkey health providers; these guidelines represent the judgment of leading experts.

In regards to the *Federal Register* notice, the agency outlines "a systematic approach to ensuring that poultry is handled and slaughtered in a manner that is consistent with good commercial practices." The outlined system describes three key points to ensure poultry are not excited,

experiencing discomfort or accidentally injured: assessment, corrective action, and evaluation. These key elements are all addressed and detailed in the NTF *Animal Care Guidelines for the Production of Turkeys* following a HACCP-like process.

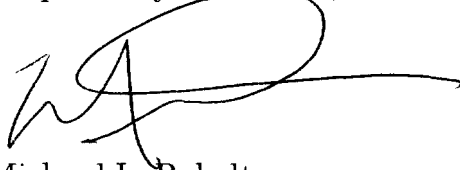
Each element of the turkey production process is outlined and all relevant animal welfare issues are addressed in a modular fashion. The agency has described seven specific issues of concern when assessing the processing of poultry, all of which are included in the NTF guidelines. The turkey industry has committed to following these standards.

There are a few concerns with the notice published in the *Federal Register* that warrant raising. FSIS states that bruises "are likely to result when birds are not treated humanely." Although poultry mishandling can result in bruising, it should be understood that this is not the only cause of bruising for the turkey industry. During the production stage, turkeys are continuously "challenging" each other. Turkeys are social animals, therefore, will establish a hierarchy within the flock, similar to other social animals, including wild turkeys. While establishments attempt to minimize such behavior, it does occur and can lead to bird injury, including bruising. The notice, as written, incorrectly suggests that any bruising results from mishandling by the processing establishment

In the notice, the agency also discussed dead birds as well as what the industry refers to as "red birds." Any bird that has expired prior to arrival (dead-on-arrival) will not be placed on the line. Likewise, in the event a red bird exits the scalding, which is extremely rare, it is immediately removed from the line. Any "red bird" is considered a cadaver and is not processed and therefore the establishment has not produced "adulterated" product.

Thank you for the opportunity to comment on this notice. Should you have any questions, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Michael L. Rybolt', with a long horizontal flourish extending to the right.

Michael L. Rybolt
Managers, Scientific and Technical Affairs