



Sanderson Farms, Inc.

Post Office Box 988 • Laurel, Mississippi 39441-0988
Telephone (601) 649-4030 Facsimile (601) 426-1461

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October 25, 2005

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

04-037N
04-037N-6
Martha L. Ewing and
Philip Stayer

Re: Docket No. 04-037N

We are writing 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. As a responsible poultry producer, Sanderson Farms is dedicated to producing the safest and highest quality products possible. Sanderson Farms has always been concerned about the welfare of our birds at all levels of production. Not only is treating animals humanly the moral and ethically correct thing to do, but is also critical to profitability. Birds subjected to stresses such as poor ventilation, disease, crowding, or overheating will adversely affect production costs and product quality. In response to our customers' increased interest in animal welfare, we have formalized our procedures regarding animal welfare and now conduct internal, second and third-party audits. The animal welfare program and audits are based on the National Chicken Council Animal Welfare Guidelines. We have also collaborated with the College of Veterinary Medicine and Poultry Science Department at Mississippi State University on several projects to assess our production practices to further improve the well-being of our birds.

While Sanderson Farms fully supports the incorporation of humanitarian methods for the slaughter of poultry, we have some concerns with the notice published in the *Federal Register*. FSIS states that bruises "are likely to result when birds are not treated humanely." Although mishandling birds can result in bruising, please understand that mishandling is not the only cause of bruising. During routine grow-out on the farm, birds may "challenge" each other to determine social hierarchy, which may result in scratches and bruises. While attempts are made to minimize aggressive behavior with lighting and

feeding programs, some birds will still fight and carry their bruises into the processing plant. Also, it has been documented that some bruises may occur after the birds are stunned and insensible during the stunning and picking processes. The notice, as written, implies that all bruising results from mishandling by the processing establishment.

In the notice, the agency also discussed what the industry refers to as “red birds” and birds that were killed by means other than slaughter (dead-on-arrival or DOA’s). DOA’s should not be put on the processing line. If a DOA is mistakenly hung on line, it is identified by the characteristic off-color and off-odor and is removed by the USDA inspectors. Carcasses with an insufficient bleed-out may also be removed as cadavers. However, insufficient bleed-out does not necessarily indicate that the bird was sensible upon entering the scalding. Indeed, if that were the case, new technologies which “stun” the bird by atmospheric control, would produce 100% “cadavers”. Whether by insufficient bleed-out or atmospheric stunning, “red birds” do not mean the establishment has produced “adulterated” product.

Thank you for the opportunity to comment on this notice. Should you have any questions, please contact either one of us.

Respectfully submitted,

Martha L. Ewing, DVM, MS, MAM

Martha L. Ewing, DVM, MS, MAM
Diplomate, American College of Poultry Veterinarians
Quality Assurance Manager
Sanderson Farms, Inc.

Philip Stayer, DVM, MS, ACPV

Philip Stayer, DVM, MS
Diplomate, American College of Poultry Veterinarians
Corporate Veterinarian
Sanderson Farms, Inc.