



December 27, 2017

Roberta F. Wagner
Assistant Administrator
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Re: Mercy For Animals Petition to Include Poultry Under the Humane Methods of Slaughter Act (Petition No. 17-06)

Dear Assistant Administrator Wagner,

We write to express our support for Rulemaking Petition 17-06, submitted on November 15, 2017 by Mercy For Animals to the Food Safety and Inspection Service (FSIS). This petition requests that FSIS initiate rulemaking to include poultry as “livestock” under the Humane Methods of Slaughter Act (HMSA) (7 U.S.C. §§ 1901–1907) and as “amenable species” under the Federal Meat Inspection Act (FMIA) (21 U.S.C. §§ 601 *et seq.*). This petition also asks FSIS to determine methods of slaughter for bird species that comply with requirements under the HMSA and issue directives, notices, and other policy and guidance documents for enforcement of the humane slaughter provisions at official poultry slaughter establishments.

Compassion Over Killing has conducted over a dozen investigations of industrial poultry facilities over the past fifteen years and has documented egregious animal abuse and suffering. In 2015, we released an investigation of a Mountaire Farms chicken slaughterhouse in North Carolina. Our investigation documented birds being violently thrown, punched, shoved, and forcefully slammed into shackles.¹ Some birds also had their feathers ripped out. Mountaire Farms is not an outlier in this cruelty – other undercover investigations have exposed similar abuses.² Current slaughter systems for poultry involve nothing short of abject torture to fully

¹ Compassion Over Killing, *Ag-Gag Warning*, <http://cok.net/inv/mountaire/>.

² See, e.g., Humane Society of the United States, *Breaking news: HSUS Undercover Video Reveals Pilgrim's Pride Has Much to Hide*, <https://blog.humanesociety.org/wayne/2017/06/breaking-news-hsus-undercover-video-reveals->

conscious animals who are able to feel pain. All farmed animals deserve protection from needless cruelty and suffering, and we urge you to grant this petition.

For nearly 60 years, it has been the law of the United States that the slaughter of livestock shall be conducted by humane methods. But the USDA's current interpretation of the HMSA excludes from its scope 98 percent of the livestock who are slaughtered for food in this country every year—flouting the spirit and letter of this law. Stated differently, the only federal law governing the humane slaughter of animals covers 146 million animals but excludes 9 billion. This is simply unacceptable.

These systems also create a greater risk of fecal contamination of meat, which is already a widespread problem. And they needlessly endanger poultry workers (representing 50 percent of the slaughterhouse workforce), who suffer debilitating musculoskeletal injuries and have an increased risk of dangerous skin and respiratory infections and exposure to antibiotic-resistant bacteria.

The HMSA has three stated goals: preventing the needless suffering of animals, making working conditions safer for slaughterhouse workers, and benefitting consumers and producers. Congress has clearly delegated you the authority under this statute to achieve these goals through meaningful regulations and policies. You should do so by including poultry under the HMSA.

Sincerely,

Irina Anta

Irina Anta

pilgrims-pride-much-hide.html; Animal Legal Defense Fund, *Tyson, Repeat OSHA Violator, Gives its Workers Lip Service Instead of Safer Conditions*, <http://aldf.org/blog/tyson-repeat-osha-violator-gives-its-workers-lip-service-instead-of-safer-conditions/>; Mercy For Animals, *Gory Food Service*, <http://www.goryfoodservice.com/>; People for the Ethical Treatment of Animals, *Exposed: Tyson Workers Torturing Birds, Urinating on Slaughter Line*, <https://support.peta.org/page/1843/action/1?locale=en-US>.